

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff and Counter-Defendant,

V.

ACKERMAN MCQUEEN, INC.,

Defendant and Counter-Plaintiff,

and

**MERCURY GROUP, INC., HENRY
MARTIN, WILLIAM WINKLER, AND
MELANIE MONTGOMERY**

Defendants.

Case No. 3:19-cv-02074-G

PLAINTIFF'S TRIAL EXHIBIT LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A)(iii) and the Court's October 13, 2020 Scheduling Order (ECF 174), as amended (ECF 358), Plaintiff National Rifle Association of America ("NRA") hereby submits its Trial Exhibit List.

The NRA may, at its sole election, request that the Court take judicial notice of, or otherwise offer any of, the below listed documents into evidence at the time of the trial. The NRA further reserves the right to offer any documents, which may be designated or offered by any Defendant. The NRA reserves the right to offer or use any exhibits (whether designated below or by the NRA) as may be necessary for cross-examination, impeachment, or rebuttal.

NRA - Exhibit List, as of February 25, 2022

Exhibit	Date	Description	Bates numbers	AMc Objection(s)
1)	01/05/94	Internal Control—Integrated Framework issued by Committee of Sponsoring Organizations of the Treadway Commission (September 1992, amended May 1994)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
2)	05/01/99	1999 Services Agreement	NRA-AMc_00048503-48514	
3)	01/16/01	2000-2001 Tedrick Audit Report	NRA-AMc_00137590-137593 NRA-AMc_00089371-89374 NRA-AMc_00185512-185518 NRA-AMc_00185508-185511	Optional Completeness – FED. R. EVID. 106 (attachments missing)
4)	07/30/02	2000-2002 Tedrick Audit Report	NRA-AMc_00089371-89374	Optional Completeness – FED. R. EVID. 106 (attachments missing)
5)	11/17/03	NRA Travel and Business Expense Reimbursement Policy	NRA-AMc_00068373-68387	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
6)	11/12/04	2004 Tedrick Audit Report	NRA-AMc_00185512-185514	Optional Completeness – FED. R. EVID. 106 (attachments missing)
7)	12/30/05	2005 Tedrick Audit Report	NRA-AMc_00185515-185518	Optional Completeness – FED. R. EVID. 106 (attachments missing)
8)	03/03/06	Letter - W. Brewer to Makris re Mercury Group's termination of the professional relationship with BAC in response to Makris termination letter which is also attached	Exhibit 25 to Makris deposition	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
9)	03/16/06	Letter dated 03/16/2006- from AMc to William A. Brewer response to letter of March 3 by W. Brewer to AMc.		Relevance – FED. R. EVID. 401, 402
10)	11/28/07	2007 Tedrick Audit Report	NRA-AMc_00185508-185511	Optional Completeness – FED. R. EVID. 106 (attachments missing)
11)	02/14/12	Workamajig License Agreement	n/a	Relevance – FED. R. EVID. 401, 402
12)	07/19/12	Email - Cox to Christman	NRA-AMc_00199015-199017	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
13)	04/01/13	Dycio - Letter of Engagement for Legal Services April 2013		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
14)	09/24/13	Here's A Dude Shooting An Elephant In The Face On NBC Sports Network	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
15)	09/26/13	NRA Strategist Kills Elephant On NBC Sports Show	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
16)	09/28/13	NBC Sports Network Cancels NRA-Sponsored Elephant Hunting Show	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
17)	09/30/13	Exclusive_ NRA-Sponsored Elephant Hunter Defends Hitler Comparison, Vows TV Return _ Media Matters for America	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
18)	12/19/14	2014 Tedrick Audit Report	NRA-AMc_00185505-185507	Optional Completeness – FED. R. EVID. 106 (attachments missing)
19)	01/03/15	Email - Tedrick to Tavangar re 2015 budget adjustments	NRA-AMc_00141958-141959	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
20)	01/15/15	Invoices 121927 - 133356	NRA-AMc_00164353-00164420	Relevance – FED. R. EVID. 401, 402
21)	02/15/15	Invoices 124247-124268	NRA-AMc_00168100 - NRA-AMc_00168304	Relevance – FED. R. EVID. 401, 402
22)	02/20/15	Invoices 124592-126496	NRA-AMc_00056393 - NRA-AMc_00056556	Relevance – FED. R. EVID. 401, 402
23)	04/16/15	Ackerman McQueen Monthly production invoice	NRA-AMc_00056440	
24)	04/22/15	Requesting backup for Invoice 126365	AMc 000997 - AMc 000998	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
25)	05/01/15	Invoices 126800-130885	NRA-AMc_00056150 - NRA-AMc_00056392	
26)	05/29/15	Email from R. Tedrick to N. Tavangar	AMc 000999 - AMc 0001000	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802 (NRA portions)
27)	05/29/15	Scheduling meeting to review 2015 budget sheet	AMc 001001 - AMc 001002	Relevance – FED. R. EVID. 401, 402
28)	08/06/15	Checklist For Transitioning To A New Digital Agency- Search Engine Land		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
29)	09/29/15	Ackerman Invoices payment delay	AMc 001012-1013	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
30)	11/18/15	2016 Budget - final	AMcTX-00065395	

NRA - Exhibit List, as of February 25, 2022

Exhibit	Date	Description	Bates numbers	AMc Objection(s)
31)	12/21/15	Invoice questions from Tedrick	AMc 001025 - AMc 001026	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802 (NRA portions)
32)	12/31/15	2015 AMc financial statements (audited)	AMcTX-00068007-68023	Relevance – FED. R. EVID. 401, 402
33)	01/05/16	Email from R. Tedrick to N. Tavangar	AMc 001030 - AMc 001031	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802 (NRA portions)
34)	01/14/16	Invoices 133652 - 143533	NRA-AMc 00101908-00101963	
35)	01/14/16	Invoices 133643-133651	NRA-AMc 00167350 - NRA-AMc 00167574	
36)	02/17/16	Invoices 136411-139076	NRA-AMc 00055942 - NRA-AMc 00056149	
37)	02/17/16	Invoices 130373-133418	NRA-AMc 00063517 - NRA-AMc 00063714	
38)	02/22/16	Email string re NRA daily flowcharts	AMc-000177	Relevance – FED. R. EVID. 401, 402 Optional Completeness – FED. R. EVID. 106 (attachments missing)
39)	02/23/16	Email - Montgomery to Parker re cost of FOX spots	AMc-000155-156	
40)	02/28/16	Makris Expense Report February 2016 "Travel" (page 3 of 9)	AMc-0030733	Relevance – FED. R. EVID. 401, 402
41)	03/06/16	Email from R. Tedrick to N. Tavangar re Monthly fee Invoices	AMc 001040	Relevance – FED. R. EVID. 401, 402
42)	03/08/16	2015 Management representation letter	NRA-NYAGCOMMDIV-00001339-1343	Relevance – FED. R. EVID. 401, 402
43)	03/11/16	Ackerman McQueen Monthly production invoice	NRA-AMc 00056133	
44)	03/30/16	Hale to Greenberg, Montgomery, Darley	AMcTX-00275655	Relevance – FED. R. EVID. 401, 402
45)	03/31/16	Makris Expense Report March 2016 "Travel" (page 5 of 9)	AMc-0030735	Relevance – FED. R. EVID. 401, 402
46)	05/05/16	Correspondence, M. Allen and N. Tavangar	NRA-AMc 00200019-21	Relevance – FED. R. EVID. 401, 402
47)	06/01/16	Correspondence, M. Allen and N. Tavangar	NRA-AMc 00200023-24	Relevance – FED. R. EVID. 401, 402
48)	06/01/16	Correspondence, M. Allen and E. Van Horn	NRA-AMc 00200025-27	Relevance – FED. R. EVID. 401, 402
49)	08/08/16	PIP / AMc Contract (Not Executed)	PIP-00004124	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
50)	08/08/16	Business Intelligence Assessment Letter Agreement from PIP dated 08/08/2016 between Ackerman McQueen and PIP	PIP-00004124-31	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
51)	08/09/16	PIP-AMc agreement re Business Intelligence Assessment (draft)	PIP-00003685-3692	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
52)	08/09/16	Business Intelligence Assessment Letter Agreement from PIP dated 08/09/2016	PIP-00004094-101	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
53)	08/17/16	PIP / AMc Contract (Not Executed)	PIP-00003947	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
54)	08/17/16	Draft Letter agreement between PIP and AM	PIP-00003947-53	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
55)	08/24/16	Non Executed Letter agreement dated 8/24/2016 between PIP and AM	PIP-00003939-46	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
56)	08/30/16	PIP-AMc agreement re Business Intelligence Assessment, dated 08/15/16	PIP-00003755-3762	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
57)	09/29/16	Invoices 139097 - 141002	NRA-AMc 00167785 - NRA-AMc 00167987	
58)	10/06/16	NRA 2017 Budget Planning prepared by AMc	NRA-AMc 00057337-57351	
59)	10/13/16	Invoices 143169-144626	NRA-AMc 00055055 - NRA-AMc 00055122	
60)	10/14/16	Letter Agreement, executed	PIP-00000027-34	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
61)	10/18/16	Invoices 141850-141871	NRA-AMc 00167989 - NRA-AMc 00168098	
62)	10/21/16	PIP / Waypoint License Agreement (Executed)	PIP-00004113	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
63)	10/22/16	Ackerman McQueen - Waypoint Licenses Signed by Jesse Greenberg on 10/21/2016	PIP-00004113-15	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
64)	10/24/16	PIP-AMc agreement re Design and Development of Dashboard, dated 10/14/16	PIP-00000027-34	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
65)	12/01/16	Invoices 144338-145143	NRA-AMc_00054999 - NRA-AMc_00055054	Relevance – FED. R. EVID. 401, 402
66)	12/06/16	2017 Budget - revised	AMcTX-00065394	
67)	12/29/16	Invoices 145221-145808	NRA-AMc_00063022 - NRA-AMc_00063088	Relevance – FED. R. EVID. 401, 402
68)	12/31/16	2016 AMc consolidated statement of income	AMcTX-00053145-53146	Relevance – FED. R. EVID. 401, 402
69)	12/31/16	2016 AMc's redacted record of "Inside Labor Cost," "Labor Hours," "Overhead Allocation," and "Misc Direct and T&E Total" for the NRA and all AMc clients	AMcTX-00053147-53156	Relevance – FED. R. EVID. 401, 402
70)	12/31/16	2016 AMc financial statements (audited)	AMcTX-00068024-68040	Relevance – FED. R. EVID. 401, 402
71)	01/05/17	Invoices 143197 - 153672	NRA-AMc_00101844 - NRA-AMc_00101907	Relevance – FED. R. EVID. 401, 402
72)	01/05/17	AM Project Change Request #1 (Issued 12/12/2016)	PIP-00000061-63	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
73)	01/12/17	Greenberg to various AMc employees regarding the opportunities to use the dashboard for other clients.	AMcTX-00276141	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
74)	01/14/17	PIP Project Change Request (Executed)	PIP-00000061	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
75)	01/16/17	Kobler to Darley et al. regarding the need to improve engagement.	AMcTX-00325781	Relevance – FED. R. EVID. 401, 402
76)	01/18/17	Wang to Greenberg and Rinaldi (PIP)	AMcTX-00276922	Relevance – FED. R. EVID. 401, 402
77)	01/19/17	Invoices 145954-147452	NRA-AMc_00054976 - NRA-AMc_00054998	Relevance – FED. R. EVID. 401, 402
78)	01/19/17	Cary Guard Contract (Not Executed)	PIP-00003648	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
79)	01/23/17	Weekly Status Report regarding the "NRA Dashboard"	AMcTX-00276956	Relevance – FED. R. EVID. 401, 402
80)	01/25/17	Kobler to R. McQueen.	AMcTX-00276979	Relevance – FED. R. EVID. 401, 402
81)	01/26/17	Greenberg to Parker	AMcTX-00277011	Relevance – FED. R. EVID. 401, 402
82)	01/31/17	Makris Expense Report January 2017 "Travel" (page 5 of 11)	AMc-00311135	Relevance – FED. R. EVID. 401, 402
83)	01/31/17	Makris Expense Report January 2017 "Travel" (page 6 of 11)	AMc-00311136	Relevance – FED. R. EVID. 401, 402
84)	01/31/17	Makris Expense Report January 2017 "Travel" (page 7 of 11)	AMc-00311137	Relevance – FED. R. EVID. 401, 402
85)	01/31/17	Makris Expense Report January 2017 "Travel" (page 8 of 11)	AMc-00311138	Relevance – FED. R. EVID. 401, 402
86)	01/31/17	Makris Expense Report January 2017 "Travel" (page 9 of 11)	AMc-00311139	Relevance – FED. R. EVID. 401, 402
87)	02/06/17	PIP Project Change Request (Executed)	PIP-00000064	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
88)	02/06/17	AM Project Change Request #2 (Issued 01/17/2017)	PIP-00000064-65	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
89)	02/10/17	Ackerman McQueen Monthly production invoice	NRA-AMc_00062995 - NRA-AMc_00062997	
90)	02/10/17	Wang to Greenberg	AMcTX-00277205	Relevance – FED. R. EVID. 401, 402
91)	02/27/17	Greenberg to Wang regarding NRATV digital campaigns.	AMcTX-00277533	Relevance – FED. R. EVID. 401, 402
92)	02/27/17	Greenberg and Wang set up call for 3/2/17	AMcTX-00277994	Relevance – FED. R. EVID. 401, 402
93)	02/28/17	Makris Expense Report February 2017 "Travel" (page 4 of 6)	AMc-00311195	Relevance – FED. R. EVID. 401, 402
94)	03/07/17	PIP Project Change Request (Executed)	PIP-00000066	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
95)	03/08/17	2016 Management representation letter	NRA-NYAGCOMMDIV-00001331-1334	Relevance – FED. R. EVID. 401, 402
96)	03/08/17	AM Project Change Request #4 (Issued 02/28/2017)	PIP-00000066	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
97)	03/15/17	Ackerman McQueen Monthly production invoice	NRA-AMc_00062932	Relevance – FED. R. EVID. 401, 402
98)	03/20/17	Invoices 147611-148333	NRA-AMc_00054878 - NRA-AMc_00054943	Relevance – FED. R. EVID. 401, 402
99)	03/21/17	NRATV March '17 Performance PowerPoint presentation.	AMcTX-00278583	
100)	03/22/17	Wang to O'Brien (PIP) regarding NRATV Dashboard Priorities Recap	AMcTX-00333045	Relevance – FED. R. EVID. 401, 402
101)	03/27/17	Invoices 147622C-149674	NRA-AMc_00054698 - NRA-AMc_00054764	
102)	03/27/17	Invoices 147622B-150672	NRA-AMc_00054856 - NRA-AMc_00054874	
103)	03/28/17	Invoices 146446 - 146750	NRA-AMc_00165984 - NRA-AMc_00166039	
104)	04/04/17	Invoices 146581-146827	NRA-AMc_00166094 - NRA-AMc_00166125	
105)	04/20/17	Email - Powell to Montgomery	AMc 000203-000207	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
106)	04/25/17	NRATV Powerpoint Presentation - NRATV Q1 2017 Analytics	AMcTX-00006696	
107)	04/27/17	Invoices 147112 - 147472	NRA-AMc_00166040 - NRA-AMc_00166093	

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
108)	04/30/17	2017 Services Agreement	NYAG-00120835-120845 NRA-AMc_00183414-183424 NRA-AMc_00050600-50610 AMc-057823-57834 AMcTX-00000162-172	
109)	04/30/17	2017 Services Agreement	NYAG-00120835-120845 NRA-AMc_00183414-183424 NRA-AMc_00050600-50610 AMc-057823-57834 AMcTX-00000162-172	
110)	05/02/17	Email - Wang to Greenberg	AMcTX-00294544-70	Relevance – FED. R. EVID. 401, 402
111)	05/10/17	NRATV Powerpoint Presentation - NRATV Video Analytics Solutions Overview	AMcTX-00045760 / AMc-002656	
112)	05/11/17	Invoices 148749	AMc-0031227 - AMc-0031231	
113)	05/11/17	Invoices 148749-149788	NRA-AMc_00054765 - NRA-AMc_00054855	
114)	05/15/17	Wang to Greenberg	AMcTX-00295054	Relevance – FED. R. EVID. 401, 402
115)	05/16/17	Email - Plunkett to Godstrey	NRA-AMc_00001510-1513	Relevance – FED. R. EVID. 401, 402
116)	05/17/17	Wang to Greenberg	AMcTX-00295144	Relevance – FED. R. EVID. 401, 402
117)	05/31/17	Makris Expense Report April/May 2017 "Travel Tips"	AMc-0031446	Relevance – FED. R. EVID. 401, 402
118)	06/23/17	Examlle of sharing login credentials	AMcTX-00295731	Relevance – FED. R. EVID. 401, 402
119)	07/07/17	Wang to Azimi	AMcTX-00296068	Relevance – FED. R. EVID. 401, 402
120)	07/13/17	Invoice 149174	NRA-AMc_00100010	Optional Completeness – FED. R. EVID. 106
121)	07/13/17	Invoices 149122 - 149174	NRA-AMc_00100014 - NRA-AMc_00100022	
122)	07/21/17	Parker to Wang	AMcTX-00319110	Relevance – FED. R. EVID. 401, 402
123)	08/01/17	Invoices 147622D - 150784	NRA-AMc_00166573 - NRA-AMc_00166635	
124)	08/25/17	Email - Rinaldi (PIP) to Wang	AMcTX-00336708	Relevance – FED. R. EVID. 401, 402
125)	08/31/17	NRATV Stats as of: August 31, 2017 - Presentation	AMc-002929-55	
126)	09/01/17	Invoices 151498-152124	NRA-AMc_00062871 - NRA-AMc_00062911	
127)	09/03/17	NRATV Powerpoint Presentation - NRATV 2018 Vision Discussion	AMcTX-00045939 / AMc-002835	
128)	09/11/17	PIP Project Change Request (Executed)	PIP-00000067	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
129)	09/11/17	AM Project Change Request #5 (Issued 09/05/2017)	PIP-00000067	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
130)	09/15/17	NRATV Powerpoint Presentation - NRATV Analytics Discussion	AMcTX-00045922 / AMc-002818	
131)	09/19/17	Invoices 150705 - 150739	NRA-AMc_00166371 - NRA-AMc_00166422	
132)	10/06/17	ICCO announces Helsinki Declaration		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
133)	10/17/17	Invoices 153039-153632	NRA-AMc_00054474 - NRA-AMc_00054529	
134)	10/18/17	NRATV Powerpoint Presentation - NRATV Q3 2017 YTD Metrics	AMcTX-00045948 / AMcTX-00038748	
135)	10/20/17	Sheppard Mullin legal invoices for Dana Loesch contract, dated 10/20/17, 11/14/17, and 12/14/17	AMc-0031508-31524	Relevance – FED. R. EVID. 401, 402
136)	10/26/17	Email - Darley to Wang	AMcTX-00337725	Relevance – FED. R. EVID. 401, 402
137)	11/02/17	Invoices 152840 - 152116	NRA-AMc_00166520 - NRA-AMc_00166572	
138)	11/07/17	Email between E. Wang & A. Bilinski	AMcTX-00338221	Relevance – FED. R. EVID. 401, 402
139)	11/22/17	NRATV Powerpoint Presentation - NRATV The Clenched Fist of Truth	AMcTX-00046044 / AMc-002929	
140)	12/04/17	Email- Wang to Bilinski	AMcTX-00323214	Relevance – FED. R. EVID. 401, 402
141)	12/20/17	NRATV Analytics - NRATV Year1: Analytics & Valuation - Mass Media Approach and AM Approach - Oct. 2016 thru Dec. 2017	AMc-002741-71	
142)	12/20/17	The Power of NRATV - Crafting and Owning a Narrative	AMc-002853-2928	
143)	12/20/17	NRATV Analytics	AMc-002956-90	
144)	12/28/17	Invoice	NRA-AMc_00054527	
145)	12/30/17	Wang to Greenberg	AMcTX-00325401	
146)	12/31/17	NRATV Powerpoint Presentation - The Power of NRATV - Crafting and Owning the Narrative	AMcTX-00045966 / AMc-002853	
147)	12/31/17	2017 AMc consolidated statement of income	AMcTX-00053164-53165	Relevance – FED. R. EVID. 401, 402

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
148)	12/31/17	2017 AMc's redacted record of "Inside Labor Cost," "Labor Hours," "Overhead Allocation," and "Misc Direct and T&E Total" for the NRA and all AMc clients	AMcTX-00053166-53175	Relevance – FED. R. EVID. 401, 402
149)	12/31/17	2017 AMc financial statements (audited)	AMcTX-00068041-68056 AMc-056721-056736	Relevance – FED. R. EVID. 401, 402
150)	01/01/18	Dana Loesch employment agreement	AMc-000055-AMc_000076; AMcTX-00045557 - 455578	
151)	01/03/18	NRATV Powerpoint Presentation - NRATV Year 1 Analytics & Valuation	AMcTX-00064865 / AMcTX-00045892 / AMc-002741	
152)	01/05/18	2018 Budget NRA final	AMcTX-00065392-65393	
153)	01/05/18	Invoices 154771-154766	NRA-AMc_00052128 - NRA-AMc_00052209	
154)	01/05/18	Ackerman McQueen Monthly production invoice	NRA-AMc_00052211 - NRA-AMc_00052212	
155)	01/09/18	Email from R. McQueen to A. McQueen	AMcTX-00003262-3309	
156)	01/09/18	Email exchange between J. Greenberg and B. Nash	AMcTX-00042332-42373	Relevance – FED. R. EVID. 401, 402
157)	01/13/18	NRA Board Meeting Minutes	NRA-AMc_00076056	
158)	01/16/18	Ex L to Spofford Decl - Email from N. Tavangar to P. Farrell	AMcTX-00061803	Relevance – FED. R. EVID. 401, 402
159)	01/16/18	Invoices 153831 - 157231	NRA-AMc_00102085 - NRA-AMc_00102108	
160)	01/19/18	Memo - NRATV Monetization Next Steps/Action Plan	AMcTX-00037291-37295	Relevance – FED. R. EVID. 401, 402
161)	01/21/18	Ex K to Spofford Decl - Email from G. Spofford	AMcTX-00061804	Relevance – FED. R. EVID. 401, 402
162)	01/23/18	NRATV Powerpoint Presentation - NRATV 2017 Analytics (including NOIR 2017 Metrics)	AMcTX-00004463 / AMcTX-00014990-15005 / AMc-039153 / AMcTX-00015576	
163)	01/23/18	NRATV Powerpoint Presentation - NOIR 2017 Metrics NRATV	AMcTX-00014990-15005 / AMc-039153 / AMcTX-00015576	
164)	01/31/18	Email - Brandon Winkler's approval of travel advance	AMc-057991	
165)	01/31/18	2018 AMc's redacted record of "Inside Labor Cost," "Labor Hours," "Overhead Allocation," and "Misc Direct and T&E Total" for the NRA and all AMc clients	AMcTX-00053185-53195	Relevance – FED. R. EVID. 401, 402
166)	02/01/18	Email - Wang to Greenberg et al re monetization dashboard that he built	AMcTX-00046799	Relevance – FED. R. EVID. 401, 402
167)	02/01/18	Invoices 155305-155313	NRA-AMc_00052292 - NRA-AMc_00052352	
168)	02/02/18	Email - Grable to Cremer, Montgomery, Phillips	AMcTX-00007396-7397	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
169)	02/07/18	Email (attachment) - Wang to Floyd	AMcTX-00051080-83	Relevance – FED. R. EVID. 401, 402; Optional Completeness – FED. R. EVID. 106 (attachments missing)
170)	02/09/18	Ex J to Spofford Decl - Email from B. Nash to G. Spofford	AMcTX-00007460	Relevance – FED. R. EVID. 401, 402
171)	02/09/18	NRATV Powerpoint Presentation - NRA America's Most Patriotic Brand	AMcTX-00045742 / AMc-002956	
172)	02/18/18	Ackerman Media Buy billings	AMcTx-00024842 - AMcTx-00024845	Relevance – FED. R. EVID. 401, 402
173)	02/19/18	Email - Warner (EVP/Creative Director) to Cremer	AMcTX-00043450, AMcTX-00007530-7532, AMcTX-00043471-43489, AMcTX-00043451-43469	Relevance – FED. R. EVID. 401, 402
174)	02/19/18	Ex I to Spofford Decl - Email from E. Wang to G. Spofford	AMcTX-00050314	Relevance – FED. R. EVID. 401, 402
175)	02/20/18	Example of Invoice billed to the NRA by AMc that contained vague, descriptive narratives like "Per Approved Budget"	NRA-AMc_00052221	
176)	02/21/18	Where the N.R.A. Speaks First and Loudest - The New York Times	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
177)	02/21/18	Invoices 155520-156894	NRA-AMc_00052507 - NRA-AMc_00052543	
178)	02/26/18	Email - Holmes to Henry Martin, Montgomery, Cremer and Petersen	AMc-058967	Relevance – FED. R. EVID. 401, 402
179)	03/03/18	Email - Wang to Greenberg and Montgomery	AMcTX-00004485-4510	Relevance – FED. R. EVID. 401, 402
180)	03/03/18	NRATV Powerpoint Presentation - Monetization	AMcTX-0004485-4510	Relevance – FED. R. EVID. 401, 402; Duplicate of Ex. 179
181)	03/05/18	Letter - W. Brewer to Frazer re The NRA Corporate Relationships Strategy - BAC retention	NRA-BK-00060708-60714	Optional Completeness – FED. R. EVID. 106 (redactions despite previously producing unredacted version)
182)	03/05/18	NRA TV: Last Week Tonight with John Oliver (HBO)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
183)	03/07/18	NRATV Powerpoint Presentation - NRATV Monetization Report	AMcTX-00003382 / AMcTX-00000763 / AMcTX-00003376	Relevance – FED. R. EVID. 401, 402
184)	03/07/18	2017 Management representation letter signed	NRA-NYAG-00073299-73302	Relevance – FED. R. EVID. 401, 402
185)	03/08/18	Email - Cox to Cox	NRA-AMc_00199023-199024	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
186)	03/09/18	Email - Stinchfield to Revan and H. Martin	AMcTX-00003383-3384	Relevance – FED. R. EVID. 401, 402
187)	03/12/18	Email - Payne to Revan	AMcTX-00003397	Relevance – FED. R. EVID. 401, 402
188)	03/15/18	Email - Stinchfield to Revan and H. Martin	AMcTX-000003409-3410	Relevance – FED. R. EVID. 401, 402
189)	03/18/18	Invoices 155966-157106	NRA-AMc_00052416 - NRA-AMc_00052460	
190)	03/21/18	National Rifle Association Annual Meetings and Exhibits 2018	AMcTX-00001637	Relevance – FED. R. EVID. 401, 402
191)	03/22/18	Lease agreement between iland Internet Solutions and Ackerman	AMcTX-00045414-45455	
192)	03/28/18	Email - Frazer to Montgomery and Cremer	AMcTX-00000609	
193)	03/28/18	Lease agreement between Cisco Capital and Ackerman	AMcTX-00045403-45407	
194)	03/31/18	Makris Expense Report Jan-Mar 2018 "FEB Supplemental" and supporting documentation to back up OOP amounts charged	AMc-0032536-32543	Relevance – FED. R. EVID. 401, 402
195)	04/01/18	Invoices 156591-156772	NRA-AMc_00052595 - NRA-AMc_00052639	
196)	04/03/18	Invoices 156809-157425	NRA-AMc_00052545 - NRA-AMc_00052593	
197)	04/04/18	M. Montgomery to B. Brewer regarding time to speak	AMc-056625	
198)	04/04/18	Email - Madrid to W. Brewer notifying W. Brewer that Madrid has "been asked to assist AM in the NRA matter"	NRA-AMc_00185607	
199)	04/06/18	Email string re enclosed digital order and flowchart for Retargeting (DBM) and Facebook amounts.	AMcTX-00001636	
200)	04/06/18	Digital Order for Retargeting (DBM) and Facebook Amounts.	AMcTX-00001638-42	
201)	04/09/18	NRATV Powerpoint Presentation - NRATV 2018 Q1 Analytics & Valuation	AMcTX-00045817 / AMc-002713	
202)	04/10/18	Correspondence from W. Brewer to J. Madrid re discussions involving compliance and common AMc matters		Hearsay – FED. R. EVID. 801, 802
203)	04/12/18	Follow up to Correspondence from W. Brewer to J. Madrid re discussions involving compliance and common AMc matters		Hearsay – FED. R. EVID. 801, 802
204)	04/13/18	Memo with attendees at NRATV meetings	AMc-059032	
205)	04/13/18	Email - Treadwell to Nancy Martin	AMcTX-00002564	
206)	04/14/18	A. McQueen email to Brewer		
207)	04/16/18	Email from A. McQueen to W. Brewer		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
208)	04/17/18	Email from W. Brewer to Jay Madrid		Hearsay – FED. R. EVID. 801, 802
209)	04/17/18	Email from Jay Madrid to W. Brewer		Hearsay – FED. R. EVID. 801, 802
210)	04/19/18	Email from Jay Madrid to W. Brewer		Hearsay – FED. R. EVID. 801, 802
211)	04/19/18	Email from W. Brewer to Jay Madrid		Hearsay – FED. R. EVID. 801, 802
212)	04/20/18	Invoices 157437-157803	NRA-AMc_00052641 - NRA-AMc_00052664	
213)	04/20/18	Email from Jay Madrid to W. Brewer re cooperation		Hearsay – FED. R. EVID. 801, 802 Optional Completeness – FED. R. EVID. 106 (attachments missing)
214)	04/25/18	Email - NRATV media request denied by AMc.	AMc-058428	Relevance – FED. R. EVID. 401, 402
215)	04/27/18	Correspondence from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
216)	05/01/18	NRATV Powerpoint Presentation - NRATV Q1 2018 Analytics	AMcTX-00036945	
217)	05/02/18	Email from J. Madrid to W. Brewer		Hearsay – FED. R. EVID. 801, 802
218)	05/02/18	Email from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
219)	05/02/18	NRA v. Lockton Affinity Series of Lockton Affinity, LLC, et al., Case 18-cv-00639 (E.D. Va. 2018)		
220)	05/04/18	Email from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
221)	05/06/18	2018 Services Agreement	AMc-056592-AMc-56593 NRA-AMc_00057325-57326	
222)	05/06/18	B. Brewer email to Madrid	AMcTX-00065480 - AMcTX-00065482	Hearsay – FED. R. EVID. 801, 802
223)	05/06/18	Email from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
224)	05/07/18	Email - Cremer to Pierron	AMcTX-00040216-40217	Relevance – FED. R. EVID. 401, 402
225)	05/07/18	NRA Board Meeting Minutes	NRA-AMc_00075497	
226)	05/07/18	Audit Committee Report	NRA-BK-00033836-37	
227)	05/07/18	Email from J. Madrid to W. Brewer		Hearsay – FED. R. EVID. 801, 802

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
228)	05/08/18	Lease agreement between Dell Financial Services and Ackerman	AMcTX-00045408-45413	
229)	05/12/18	Email from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
230)	05/14/18	Email from J. Madrid to W. Brewer		Hearsay – FED. R. EVID. 801, 802
231)	05/14/18	Email from J. Madrid to W. Brewer		Hearsay – FED. R. EVID. 801, 802
232)	05/15/18	North employment agreement	AMc-056595-056604 NYAG-00180410-NYAG-00180419	
233)	05/15/18	Projected increases to NRA fees due to hiring of North	AMcTX-00067704	
234)	05/15/18	Invoice	NRA-AMc 00052611	
235)	05/16/18	Email from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
236)	05/17/18	AMc invoice re Out of Pocket Expenses	AMc-0032289-32314	
237)	05/21/18	Email from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
238)	05/29/18	B. Brewer requests from Madrid	AMcTX-00065619	Hearsay – FED. R. EVID. 801, 802
239)	06/07/18	Email from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
240)	06/11/18	Email from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
241)	06/12/18	Madrid delaying meetings	AMcTX-00065631	Hearsay – FED. R. EVID. 801, 802
242)	06/13/18	Madrid to B. Brewer regarding M. Montgomery	AMcTX-00065633	Hearsay – FED. R. EVID. 801, 802
243)	06/19/18	Madrid and B. Brewer email	AMcTX-00065637	Hearsay – FED. R. EVID. 801, 802
244)	06/21/18	Invoice 157570	NRA-AMc 00173989 - NRA-AMc 00173990	
245)	06/22/18	Email from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
246)	06/28/18	Invoices 158039-158118	NRA-AMc_00174005 - NRA-AMc_00174007	
247)	06/30/18	Makris Expense Report June 2018 "Travel"	AMc-0032418-32419	Relevance – FED. R. EVID. 401, 402
248)	07/02/18	B. Brewer to Madrid	AMcTX-00065639	Hearsay – FED. R. EVID. 801, 802
249)	07/02/18	Email from J. Madrid to W. Brewer		Hearsay – FED. R. EVID. 801, 802
250)	07/03/18	Invoices 158196 - 158210	NRA-AMc 00174234 - NRA-AMc_00174250	
251)	07/07/18	Email - Hart to Montgomery	AMcTX-00041539	
252)	07/10/18	Email - Hart to Montgomery	AMcTX-00041549	
253)	07/10/18	Email - Hart to Montgomery	AMcTX-00041551-41552	
254)	07/10/18	Email - Spray deposition (VA), Hart to Montgomery		
255)	07/11/18	AMc invoice - Out of Pocket Expenses	AMc-037073	
256)	07/12/18	Invoices 158045-158060	NRA-AMc 00173991 - NRA-AMc 00174004	Relevance – FED. R. EVID. 401, 402
257)	07/12/18	Invoices 157844-158232	NRA-AMc 00174083 - NRA-AMc 00174131	Relevance – FED. R. EVID. 401, 402
258)	07/12/18	Invoices 157857-157903	NRA-AMc 00174132 - NRA-AMc_00174135	Relevance – FED. R. EVID. 401, 402
259)	07/13/18	Email - Rowling to Tedrick	NRA-AMc_00063924-63926 NRA-AMc 00068920-68921	
260)	07/17/18	Email - Hart to Montgomery	AMcTX-00041562	
261)	07/19/18	Invoices 158032	NRA-AMc 00174032 - NRA-AMc_00174033	
262)	07/23/18	Email from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
263)	07/24/18	Email from J. Madrid to W. Brewer		Hearsay – FED. R. EVID. 801, 802
264)	07/26/18	Invoice 158521	NRA-AMc 00174137 - NRA-AMc 00174138	
265)	07/26/18	Correspondence from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
266)	07/31/18	Makris Expense Report July 2018	AMc-0032819-32859	Relevance – FED. R. EVID. 401, 402
267)	07/31/18	Invoices 158751 - 159070	NRA-AMc 00174299 - NRA-AMc_00174368	Relevance – FED. R. EVID. 401, 402
268)	08/01/18	Email from Jay Madrid to W. Brewer		Hearsay – FED. R. EVID. 801, 802
269)	08/01/18	Email from W. Brewer to J. Madrid re talk		Hearsay – FED. R. EVID. 801, 802
270)	08/02/18	Invoice 159009	NRA-AMc 00174251 - NRA-AMc 00174252	
271)	08/03/18	Letter from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
272)	08/03/18	Article - Dylan Matthews, The National Rifle Associaiton, America's most powerful lobby, claims it's in financial crisis. What?, Vox		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
273)	08/06/18	Email from M. Erstling to R. Tedrick and J. Powell	NRA-AMc 00188206	
274)	08/06/18	Vendor Reduction Contact List	NRA-AMc 00188207 (produced in native)	
275)	08/07/18	J. Madrid to W. Brewer		
276)	08/08/18	Letter - Phillips to Bill Winkler	AMc-058776 NRA-AMc_00063974-00063976 NRA-AMc_00068309	
277)	08/08/18	Letter - Phillips to Bill Winkler	AMc-058777-58778 NRA-AMc 00068307-68308	

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
278)	08/09/18	Email - J. Romanovich to WLP	N/A	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)
279)	08/13/18	Letter - Bill Winkler to Phillips re 8/8/18 letter	AMcTX-00002893-2894 NRA-AMc_00063983-63984	
280)	08/13/18	Email - Cremer to Pierron (Landini)	AMcTX-00005432-5434	Relevance – FED. R. EVID. 401, 402
281)	08/14/18	Email - Montgomery to Makris and Tavangar	AMcTX-00019192-19194	Relevance – FED. R. EVID. 401, 402
282)	08/14/18	Letter (draft) - Phillips to Bill Winkler	NRA-AMc_00057152 AMc-057545	Relevance – FED. R. EVID. 401, 402
283)	08/14/18	Draft Letter from W. Phillips to W. Winkler	NRA-AMc_00063993	Relevance – FED. R. EVID. 401, 402
284)	08/14/18	Email - Counsel for MMP to NRA	NRA-AMc_00068438	Relevance – FED. R. EVID. 401, 402
285)	08/14/18	Email - R. Charnley to W. Phillips	NRA-AMc_00068438 - NRA-AMc_00068442	Relevance – FED. R. EVID. 401, 402 Duplicate of Ex. 284
286)	08/15/18	Presentation of NRATV 2018 YTD: Analytics Executive Overview YTD thru August 15, 2018	AMc-037169-82	
287)	08/16/18	Invoices 159089-159308	NRA-AMc_00174139 - NRA-AMc_00174142	Relevance – FED. R. EVID. 401, 402
288)	08/20/18	Email Chain between J. Greenberg & E. Ned Taking down the Dashboard_	AMcTX-00054759	Relevance – FED. R. EVID. 401, 402
289)	08/22/18	Letter - Ryan to W. Brewer	AMcTX-00065340-65342	
290)	08/24/18	Email - Bill Winkler to Revan, Brandon Winkler and Montgomery	AMcTX-00036386-36387	Relevance – FED. R. EVID. 401, 402
291)	08/24/18	Email - Montgomery to Bill Winkler	AMcTX-00036388-36389	Relevance – FED. R. EVID. 401, 402
292)	08/24/18	Article - David Cole, ACLU.org, New York State Can't Be Allowed to Stifle the NRA's Political Speech		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
293)	08/27/18	Email from B. Winkler to W. Phillips	AMc-057577	Optional Completeness – FED. R. EVID. 106 (attachments missing)
294)	08/27/18	Documents in response to request for Carryguard items	AMc-057578-79	
295)	08/27/18	Addressing issues of Aug 14, 2018 letter	AMc-057580 - AMc-057581	
296)	08/27/18	Letter - Bill Winkler to Phillips re clarifications on document request re examination of files, books and records	AMcTX-00003702-3703	
297)	08/27/18	Letter from W. Brewer to S. Ryan responding to August 24th letter		Hearsay – FED. R. EVID. 801, 802
298)	08/28/18	Invoices 158755-159590	NRA-AMc_00174211 - NRA-AMc_00174233	Relevance – FED. R. EVID. 401, 402
299)	08/29/18	NRATV Powerpoint Presentation - NRATV Analytics through 08/01/18	AMcTX-00014856	
300)	08/29/18	NRATV Powerpoint Presentation - NRATV 2018 YTD Executive Overview	AMcTX-00045790	
301)	08/29/18	Review Ackerman books and records	NRA-AMc_00057263 - NRA-AMc_00057265	
302)	08/29/18	North Conflicts Questionnaire	NRA-AMc_00171317	Relevance – FED. R. EVID. 401, 402
303)	08/30/18	Invoices 159722-732	NRA-AMc_00174143 - NRA-AMc_00174159	Relevance – FED. R. EVID. 401, 402
304)	08/30/18	Invoices 160504-160517	NRA-AMc_00174373 - NRA-AMc_00174389	Relevance – FED. R. EVID. 401, 402
305)	09/01/18	Letter from W. Brewer to S. Ryan regarding North Contract	NRA-AMc_00199979	Hearsay – FED. R. EVID. 801, 802
306)	09/04/18	Winkler Letter to Phillips Re Audit Protocol	AMC_057595	
307)	09/04/18	Employment Agreement of Dave Valinski	AMc-036766	
308)	09/04/18	Email - Montgomery to Tavangar	AMc-059217	Relevance – FED. R. EVID. 401, 402
309)	09/05/18	Letter from J. Madrid to W. Brewer		
310)	09/06/18	Email - Montgomery forwarding to Revan an email from Hart (dated 7/10/18) re questions by tax consultant on terms of North contract in the context of the form 990 filing. Hart notes "Audit will receive only the info contained in your summary" and "[q]uestion six [whether show hosts are independent contractors or employees of AMc] can be helpful depending on what you tell me. I assume they are all paid and the ON contract tracks the standard contract."	AMcTX-00037323	
311)	09/06/18	Letter from W. Brewer to J. Madrid		Hearsay – FED. R. EVID. 801, 802
312)	09/06/18	Chain of correspondence between W. Brewer and S. Ryan re North Contract		Hearsay – FED. R. EVID. 801, 802
313)	09/07/18	Email - Ryan to BAC re needed consent from North to provide North contract	Exhibit 003 of the North deposition (not produced by AMc or NRA)	Hearsay – FED. R. EVID. 801, 802

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
314)	09/07/18	Chain of correspondence between S. Ryan and W. Brewer RE Update regarding Col. North		Hearsay – FED. R. EVID. 801, 802
315)	09/08/18	NRA Board Meeting Minutes	NRA-AMc_00077292	
316)	09/09/18	Audit Committee Meeting Minutes	NRA-AMc_00069031-37	
317)	09/11/18	Email - Winkler to Tavangar and Brandon Winkler re "NRA Accounting is holding payment for invoices 159388 and 160161 for reason that they require backup. These are OOP invoices for July and August." Bill Winkler asks "Who in accounting - important."	AMc-037255-037256	Relevance – FED. R. EVID. 401, 402
318)	09/11/18	Letter from J Madrid to W. Brewer re Your Letter of September 6, 2018		
319)	09/11/18	B. Winkler to W. Phillips regarding audit protocol		
320)	09/11/18	Article - Edwin Rios, Dear NRA: Putting KKK Hoods on Beloved Childhood Characters Probably Isn't the Best Strategy, Mother Jones		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
321)	09/12/18	Ackerman Audit Schedule for Sep 17 and 18, 2018	AMc-059225 - AMc-059226	
322)	09/12/18	W. Brewer letter to J. Madrid responding to September 11, 2018 letter re "building a case"		Hearsay – FED. R. EVID. 801, 802
323)	09/12/18	J. Frazer to G. Betts re Brewer team and document inspections		
324)	09/12/18	Article - Niraj Chokshi, N.R.A. Show Puts Thomas the Tank Engine in White Hood to Criticize Diversity Move, The New York Times		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
325)	09/12/18	Article - Ryan W. Miller, Angry over diversity in children's show, NRA TV depicts 'Thomas & Friends' in KKK hoods, USA Today		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
326)	09/13/18	Email - Makris to Hart re article in Washington Post re "Lawyer representing NRA is kicked out of Virginia federal case," noting "[s]o why is [W. Brewer] auditing us on Monday....?"	AMcTX-00035738-35739	
327)	09/13/18	Email from Duane Reno to Lisa Supernaugh enclosing Vendor Letters	NRA-AMc_00068484	
328)	09/13/18	Email - North to Cox, Hallow et al re the need of establishing "editorial guidance" after the Thomas the Tank incident.	NRA-AMc-00199018-199022	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
329)	09/13/18	J Frazer email to G. Betts Brewer team and document inspections		
330)	09/13/18	Cover Email from D. Reno to L. Supernaugh Attaching Form Vendor Letters & 50K		
331)	09/14/18	Article - Chloe Melas, NRA TV depicts 'Thomas & Friends' in KKK hoods, CNN		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
332)	09/14/18	Article - Robert J. Spitzer, What's behind NRA TV's grotesque take on 'Thomas & Friends', CNN		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
333)	09/14/18	Article - Danielle Cinone, 'Thomas & Friends' owner fires back after NRA show portrays characters in KKK hoods, New York Daily News		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
334)	09/18/18	Email - Makris to Hart noting "Steve Ryan, our counsel, is expecting your call....call him about your 'audit'"	AMc-044303	Relevance – FED. R. EVID. 401, 402
335)	09/18/18	BAL Email to G Betts Copies of AMc records		Hearsay – FED. R. EVID. 801, 802
336)	09/19/18	G. Betts email to BAL re Copies of AMc Records		Hearsay – FED. R. EVID. 801, 802
337)	09/19/18	SBR to G. Betts NRA Ackerman Video Copying, Legal Fees		Hearsay – FED. R. EVID. 801, 802
338)	09/20/18	C. Barton obo G. Betts to SBR re NRA Ackerman Video Copying, Legal Fees		Hearsay – FED. R. EVID. 801, 802
339)	09/20/18	WAB to G. Betts, SBR re NRA Ackerman Video Copying, Legal Fees		Hearsay – FED. R. EVID. 801, 802
340)	09/21/18	Email - Revan to Angus and Makris re a call with Supernaugh et al. presumably about the Q3 2018 budget cuts. Revan notes that he "would like to reply to this copying Tony, Hart and North as additions to the call."	AMc-034756	Relevance – FED. R. EVID. 401, 402

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
341)	09/21/18	Email - Revan to Montgomery re budget adjustments noting that "[t]his entire thing needs to be forwarded to North after your convo or first thing Monday, whichever comes first"	AMc-058557-58558	Relevance – FED. R. EVID. 401, 402
342)	09/21/18	Email from L. Supernaugh TO Bill Winkler, Brandon Winkler, M Montgomery, N Tavangar		
343)	09/24/18	Letter (draft) - Angus to WLP re budget adjustments	AMc-058564-58572 AMc-058859-58867	
344)	09/24/18	Email from B Winkler to C Spray, L. Supernaugh		
345)	09/25/18	L. Supernaugh Email B Winkler	AMcTX-00000241	
346)	09/26/18	Email - Montgomery to Sprangers and Holmes	AMcTX-00000796	
347)	09/30/18	Email - Makris to Hart	AMc-034837-34840	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802 (Hart statements)
348)	10/01/18	NRATV Powerpoint Presentation - NRATV YTD Q3'18: Analytics	AMcTX-00045846 / AMc-002772 / AMcTX-00042193	
349)	10/02/18	Email - B. Winkler to C. Spray, J. Powell, L	AMc-037554	
350)	10/03/18	NRATV YTD Q3'18: Analytics - Mass Media Approach and AM Approach - Jan. 1, 2018 to Oct. 3, 2018 - Presentation	AMc-002772-817	
351)	10/04/18	Email - Montgomery to Bill Winkler, Cremer, Atterberry and Ackerman	AMc-057676-5677	Relevance – FED. R. EVID. 401, 402
352)	10/04/18	Email - W. Lapierre to W. Winkler	AMc-058611	
353)	10/04/18	Letter - Powell to Bill Winkler re additional guidance on the enhanced invoice compliance requirements	NRA-AMc_00057377-57389	
354)	10/04/18	Services Agreement, dated 4/30/2017 (Amended May 6, 2018)	NRA-AMc_00064218 - NRA-AMc_00064230 at 4218-4223	Duplicate of Ex. 353
355)	10/05/18	Email - C. Spray to B. Winkler attaching letter	AMcTX-00000295-296	Optional Completeness – FED. R. EVID. 106 (attachments missing)
356)	10/05/18	Email - B. Winkler to C. Spray, J. Powell attaching letter	AMcTX-00000297-298	
357)	10/06/18	Email - L. Supernaugh and B. Winkler	AM 00000912	
358)	10/06/18	Email - Hart to Makris	AMc-034928	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802 (Hart statements)
359)	10/06/18	Budget Adjustments	NRA-AMc_00064257 - NRA-AMc_00064258	
360)	10/06/18	Email - C. Spray to B. Winkler attaching letter	NRA-AMc_00064257-58	
361)	10/08/18	Email - SBR to Betts and Madrid re additional document requests (same email trail as 10/9/18 between Hart and Makris)	AMcTX-00010683	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
362)	10/08/18	D+D541:O547ycio & Biggs Invoice Dated October 8, 2018	NRA-DYCIO000000051 - 74	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)
363)	10/09/18	NRATV 2018 YTD: Analytics Executive Overview - YTD Through October 9, 2018 - Presentation	AMc-002700-12	
364)	10/09/18	Email - Hart to Makris re "38 years of historical practice could be a nice target for a NYAG"	AMcTX-00010643-10653 AMcTX-00010526-10530	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802 (Hart statements)
365)	10/09/18	SBR, W. Brewer emails with G. Betts	NRA-AMc_00064263 - 68	Hearsay – FED. R. EVID. 801, 802
366)	10/09/18	Video Copying, Legal Fees	NRA-AMc_00064269	Hearsay – FED. R. EVID. 801, 802
367)	10/11/18	NRATV Powerpoint Presentation - NRATV YTD Q3'18: Analytics Executive Overview (updated)	AMcTX-00045804 / AMcTX-00042236 / AMC-002700	
368)	10/11/18	Makris to Hart		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802 (Hart statements)
369)	10/16/18	Budget - 2018 and 2019 comparisons	AMcTX-00065376-65391 NRA-AMc_00185553-185568	
370)	10/24/18	Email from Montgomery to Todd Grable	NRA-AMc_00045619	
371)	10/24/18	Email chain between T. Grable and M. Montgomery	NRA-AMc_00045626-27	
372)	10/24/18	North's Kitchen Cabinet Agenda for the 10/24/18 meeting	NRA-AMc_00057543-57545	
373)	10/29/18	NRATV Powerpoint Presentation - NRATV NOIR YTD 2018 (slide)	AMcTX-00045965	

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
374)	10/30/18	Invoices 161247 - 161616	NRA-AMc_00174417 - NRA-AMc_00174442	
375)	11/05/18	Email - Montgomery to Spray	NRA-AMc-00045813-45817	
376)	11/09/18	Email - N. Reaves and AMc executives	AMcTX-00036444	
377)	11/09/18	Email - N. Reaves and AMc executives	AMcTX-00065148	Optional Completeness – FED. R. EVID. 106 (attachments missing)
378)	11/12/18	Email - N. Reaves and L. Cremer	AMcTX-00065319	
379)	11/13/18	Excel spreadsheet of Carry Guard invoices	AMcTX-00065313	
380)	11/16/18	Email - N. Reaves and B. Winkler and L. Cremer	AMcTX-00065308	
381)	11/19/18	Email - Montgomery to Spray re finalization of budget	NRA-AMc_00045906	
382)	11/19/18	Digital Extortion: Don't Let Your Data Be Held Hostage- Search Engine Journal		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
383)	11/27/18	Ex A to Spofford Decl - Email from B. Floyd to G. Spofford	AMcTX-00062075	Relevance – FED. R. EVID. 401, 402; Duplicate of Ex. 384
384)	11/27/18	Email - Floyd to Spofford re "mapping procedure ver 3"	AMcTX-00062075-62116	Relevance – FED. R. EVID. 401, 402
385)	11/29/18	Email - Makris to Hart forwarding email from Four Seasons Hotels and Resorts	AMc-044389	Relevance – FED. R. EVID. 401, 402
386)	11/29/18	Email - Van Horn to Montgomery	AMcTX-0006107-6108	Relevance – FED. R. EVID. 401, 402
387)	11/29/18	Invoices 161956 - 161960	NRA-AMc_00174391 - NRA-AMc_00174397	
388)	11/30/18	Memorandum from W. LaPierre to the NRA Board of Directors	NRA-AMc_00160970-71	
389)	12/04/18	2019 budget - revised	AMcTX-00043494	
390)	12/05/18	Ex C to Spofford Decl - Email chain between A. Bilinski & J. Greenberg & G. Spofford	AMcTX-00059537	Relevance – FED. R. EVID. 401, 402
391)	12/06/18	Ex D to Spofford Decl - Email Chain between J. Greenberg; A. Bilinski & G. Spofford	AMcTX-00059567	Relevance – FED. R. EVID. 401, 402
392)	12/06/18	Invoices 160163 - 160250	NRA-AMc_00174253 - NRA-AMc_00174298	
393)	12/06/18	Invoices 160218 - 160238	NRA-AMc_00185589 - NRA-AMc_00185598	
394)	12/12/18	NRATV Powerpoint Presentation - NRATV 2018 YTD Analytics	AMcTX-00014872 / AMcTX-00014855	
395)	12/14/18	Email - Makris to Hart	AMc-044411-44412	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802 (Hart statements)
396)	12/14/18	Email - Makris to Hart	AMc-044420-44421	
397)	12/19/18	Email from M. Erstling to C. Spray regarding payments held	NRA-AMc_00173148	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
398)	12/19/18	Invoices 160696-161996	NRA-AMc_00174160 - NRA-AMc_00174210	
399)	12/19/18	Invoices 160472 -161902	NRA-AMc_00185519 - NRA-AMc_00185551	
400)	12/21/18	Letter - SBR to Madrid	AMcTX-00011121-11122	
401)	12/21/18	Request for Additional Materials	NRA-AMc_00068870 - NRA-AMc_00068871	Duplicate of Ex. 402
402)	12/22/18	Email - Makris to Hart	AMcTX-00035850-35851	
403)	12/27/18	Invoices 162568 - 162570	NRA-AMc_00174398 - NRA-AMc_00174409	
404)	12/27/18	Invoices 162693 - 162570	NRA-AMc_00174410 - NRA-AMc_00174416	
405)	12/29/18	Ex H to Spofford Decl - Daily NRATV Email Stats - 1/19/2018 - 12/28/2018	NRA-AMc_00083796	Relevance – FED. R. EVID. 401, 402
406)	12/29/18	Email - Automated email to Spofford, Floyd, Darley	NRA-AMc_00083796-83820	Relevance – FED. R. EVID. 401, 402
407)	12/31/18	Amendment No. 1 to North employment agreement	AMc-000077-88	
408)	12/31/18	2018 AMc consolidated statement of income	AMcTX-00053183-53184	Relevance – FED. R. EVID. 401, 402
409)	12/31/18	2018 AMc financial statements (audited)	AMcTX-00068057-68073	Relevance – FED. R. EVID. 401, 402
410)	01/01/19	Daily NRA TV Email Stats - Jan 2019 - July 2019	NRA-AMc_00083828	Relevance – FED. R. EVID. 401, 402
411)	01/01/19	Summary of terms in North employment agreement	NRA-AMc_00199978	
412)	01/03/19	Invoices 163404-163817	NRA-AMc_00068874 - NRA-AMc_00068887	
413)	01/04/19	Letter - Madrid to Hart	NRA-AMc_00065378-65382	
414)	01/04/19	Response to Brewer Letter of December 21, 2018	NRA-AMc_00173893 - NRA-AMc_00173897	Duplicate of Ex. 413
415)	01/05/19	Email - Revan to Angus	AMc-058468	Relevance – FED. R. EVID. 401, 402
416)	01/05/19	NRA Board Meeting Minutes	NRA-AMc_00073923	
417)	01/06/19	Audit Committee Meeting Report	BOD_NRA-BK-00033846-50	
418)	01/14/19	Invoices 163879-163888	AMc-039702 - AMc-039703	
419)	01/14/19	Invoice 163888	NRA-AMc_00059964	
420)	01/15/19	Email from P. Padilla to A. Onge	NRA-AMc_00068873 - NRA-AMc_00068887	
421)	01/15/19	Invoice 163032	NRA-AMc_00174370 - NRA-AMc_00174372	

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
422)	01/16/19	NRA Review of Records	NRA-AMc_00064316 - NRA-AMc_00064318	
423)	01/18/19	NRATV Powerpoint Presentation - NRATV 2018 Metrics presentation	AMcTX-00045726 / AMcTX-00015697 / AMcTX-00015715 / AMcTX-00015625 / AMcTX-00016616 / AMc-040053	
424)	01/18/19	Agreement for Forensic Accounting Services provided by FRA	NRA-AMc_00205167	
425)	01/22/19	Email- Hart to Ryan	NRA-AMc_00113991	
426)	01/24/19	Invoices 163406 - 163418	NRA-AMc_00161502 - NRA-AMc_00161518	
427)	01/24/19	Invoices 163288-163290	NRA-AMc_00174455 - NRA-AMc_00174461	
428)	01/24/19	Invoices 163293-163404	NRA-AMc_00174462 - NRA-AMc_00174464	
429)	01/29/19	Agreement for Forensic Accounting Services provided by FRA	NRA-AMc_00205149-205166	
430)	01/30/19	Frazer to Ryan re document request	NRA-AMc_0011434	
431)	02/01/19	Email String Re: Qlik Reference Info	AMcTX-00064070-73	Relevance – FED. R. EVID. 401, 402
432)	02/01/19	Ex E to Spofford Decl - Email from C. Davis to A. Bilinski	AMcTX-00064080	Relevance – FED. R. EVID. 401, 402 Duplicate of Ex. 431
433)	02/01/19	Invoice 164149	NRA-AMc_00078926	
434)	02/03/19	Email - Email correspondence between Hart and Ryan; Frazer	AMcTX-00000400-404	
435)	02/04/19	Email - Ackerman to Montgomery and Cremer	AMc-059450-59453	
436)	02/04/19	Betts to Frazer re document request	AMcTX-00000573	
437)	02/05/19	Ex F to Spofford Decl - Email from C. Davis to A. Bilinski	AMcTX-00064114	Relevance – FED. R. EVID. 401, 402
438)	02/06/19	Audit Committee Report	NRA-BK-00097682-83	
439)	02/07/19	Email - Powers to Hakim (New York Times)	AMc-008729	Optional Completeness – FED. R. EVID. 106 (attachments missing)
440)	02/07/19	Email - Makris to Hart	AMc-035229-35232	
441)	02/07/19	Ex G to Spofford Decl - Email from C. Davis to A. Bilinski	AMcTX-00064172	Relevance – FED. R. EVID. 401, 402
442)	02/11/19	Correspondence between J. Frazer and FRA records review	NRA-AMc_00115719 - NRA-AMc_00115721	
443)	02/13/19	Invoices 164525-164607	NRA-AMc_00078964 - NRA-AMc_00078968	
444)	02/19/19	North Conflicts Questionnaire	NRA-AMc_00175583	
445)	02/21/19	Invoices 163635 - 163651	NRA-AMc_00091216 - NRA-AMc_00091238	
446)	02/22/19	Email - from S. Rowling regarding Top Concerns for Audit Committee	NRA-AMc_00068915	Relevance – FED. R. EVID. 401, 402
447)	02/26/19	WLP letter to OLN	NRA-AMc_00064573	
448)	03/01/19	Invoice 164866	AMc-040741	
449)	03/01/19	Email - Van Horn to Spofford re NRATV views that "look extremely low"	AMcTX-00064445	Relevance – FED. R. EVID. 401, 402
450)	03/01/19	Email from E. Van Horn to G. Spofford regarding low views of NRATV videos as per Qlik Dashboard	AMcTX-00064445	Relevance – FED. R. EVID. 401, 402 Duplicate of Ex. 449
451)	03/08/19	Audit Committee Report	NRA-BK-00098090-93	
452)	03/11/19	Memo - Note describing Powers' conversation with Hakim (New York Times)	AMc-008730	Relevance – FED. R. EVID. 401, 402 Optional Completeness – FED. R. EVID. 106
453)	03/11/19	Email - Angus to Makris re NRATV New York Times story noting "I think this NYT reporter has revealed his source(s) for whatever is revealed in his story!"	AMc-035246-35247	Relevance – FED. R. EVID. 401, 402
454)	03/11/19	Rupal Parekh, "The NRA and Ackerman McQueen: One of the strongest relationships in AdLand," AdAge, March 11, 2019	None (article)	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
455)	03/12/19	Letter - Madrid to Frazer re retention of BAC and allegation that the NRA leaked information to New York Times	AMcTX-00065364-65367	
456)	03/12/19	FRA draft spreadsheet re Makris' OOP expenses	NRA_AM_FRA_0013868	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)
457)	03/12/19	FRA draft spreadsheet re Schropp's OOP expenses	NRA_AM_FRA_0013869	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)
458)	03/12/19	FRA draft spreadsheet re OOP expenses for various AMc executives	NRA_AM_FRA_0013870	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
459)	03/12/19	FRA draft spreadsheet re Tavangar's OOP expenses	NRA_AM_FRA_0013871	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)
460)	03/12/19	FRA draft spreadsheet re budgets	NRA_AM_FRA_0013872	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)
461)	03/12/19	FRA draft spreadsheet re AMc's media buys	NRA_AM_FRA_0013873	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)
462)	03/14/19	Letter - Frazer to Madrid	AMc-035264-35265	
463)	03/14/19	Invoice 163945	NRA-AMc_00078974	
464)	03/14/19	Invoices 164878 - 164882	NRA-AMc_00079033 - NRA-AMc_00079035	
465)	03/14/19	Invoices 164899 - 164905	NRA-AMc_00079036 - NRA-AMc_00079041	
466)	03/15/19	Email - Makris to Revan	AMcTX-00035917-35918	Relevance – FED. R. EVID. 401, 402 Optional Completeness – FED. R. EVID. 106
467)	03/15/19	Email - Perrine to Tavangar	NRA-AMc_00085292	Relevance – FED. R. EVID. 401, 402
468)	03/16/19	Letter - Makris to W. Brewer	AMc-007792-7793	Relevance – FED. R. EVID. 401, 402
469)	03/21/19	Email - Makris to Hart	AMc-035277-35278	
470)	03/21/19	Letter - Sullivan (counsel for North) and W. Brewer	OLN00208-209	
471)	03/22/19	Letter - North, Childress and Meadows to W. Brewer	NRA-AMc_00069015-69016	
472)	03/22/19	Email - D. Benedict to B. Godstrey	NRA-AMc_00119846 - NRA-AMc_00119849	Relevance – FED. R. EVID. 401, 402
473)	03/22/19	Excel Spreadsheet - NRATV registered users	NRA-AMc_00119850	Relevance – FED. R. EVID. 401, 402
474)	03/22/19	Email - D. Benedict to B. Godstrey	NRA-AMc_00119863 - NRA-AMc_00119866	Relevance – FED. R. EVID. 401, 402
475)	03/24/19	Email - Makris to Revan re Montgomery's response to Arulanandam's request for Dana Loesch's contract	AMc-035296-35297	Relevance – FED. R. EVID. 401, 402
476)	03/25/19	Document Inspection by Forensic Risk Alliance	NRA-AMc_00071193 - NRA-AMc_00071194	
477)	03/28/19	Invoices 164469-164470	NRA-AMc_00078970 - NRA-AMc_00078971	
478)	03/28/19	Invoices 164883 - 164888	NRA-AMc_00079043 - NRA-AMc_00079048	
479)	03/29/19	Memo from O. North to WLP	NRA-AMc_00191401	
480)	03/31/19	Letter - North to WLP re BAC billing	OLN00216-220	
481)	04/01/19	Invoices 165588	AMc-041430	
482)	04/01/19	Invoice 165580	AMc-041452	
483)	04/07/19	NRATV 2019 Update - Jan 1 thru Apr 7 - Presentation	AMc-002844-52	
484)	04/08/19	Email - Arulanandam to Montgomery and Revan re Request for NRATV data	AMcTX-00006137	
485)	04/08/19	Letter - North to WLP re BAC	OLN00225-00228	
486)	04/09/19	Email - Montgomery to Arulanandam	AMc-059494-59495	
487)	04/09/19	Email from M. Montgomery to A. Arulanandam	NRA-AMc_00059407	
488)	04/09/19	Letter - North to WLP re cancelled meeting and BAC billing	OLN00173	
489)	04/10/19	Email - Montgomery to WLP	AMcTX-00000845	
490)	04/10/19	Email thread between M. Montgomery & A. Arulanandam dated 4/10/2019;	NRA-AMc_00059409	
491)	04/10/19	M. Montgomery email to A. Arulanandam	NRA-AMc_00176399	
492)	04/11/19	Email - North to Frazer attaching the North contract and amendment to North contract, along with memo	OLN00230-247 NRA-AMc_00060542-60559	
493)	04/15/19	Email - Powers to Revan and Angus re NRA lawsuit / AMc media statement	AMc-009673	Relevance – FED. R. EVID. 401, 402
494)	04/15/19	Statement from AMc - re NRA lawsuit	AMc-009692	Relevance – FED. R. EVID. 401, 402
495)	04/15/19	Email - Powers to Angus, Revan, Montgomery, Makris and Tavangar	AMcTX-00042029-42031	Relevance – FED. R. EVID. 401, 402
496)	04/15/19	Email - Boren to Bill Lance (Chickasaw)	NRA-AMc-00141141-141142	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Optional Completeness – FED. R. EVID. 106
497)	04/15/19	Email - Murphy to Rendon re meeting with North	RENDONGROUP000023-26	Relevance – FED. R. EVID. 401, 402

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
498)	04/15/19	Statement from Ackerman McQueen		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37(c)
499)	04/16/19	Letters from M. Dycio regarding Document Preservation, dated April 16 & 17, 2019		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
500)	04/16/19	Hermes, Grant, “NRA Sues Oklahoma City Based Ad Firm Ackerman McQueen,” News9.com, April 16, 2019	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
501)	04/17/19	Ex B to Spofford Decl - Email chain between G. Spofford & E. Horn & J. Greenberg	AMcTX-00059627	Relevance – FED. R. EVID. 401, 402
502)	04/17/19	Email - Spofford to Van Horn	AMcTX-00059627-59629	Relevance – FED. R. EVID. 401, 402
503)	04/17/19	Spies, Mike, “Secrecy, Self-Dealing, and Greed at the NRA,” New Yorker, April 17, 2019	None (article)	
504)	04/19/19	NRATV Powerpoint Presentation - NRATV Q1 2019 Analytics	AMc-002640-2655	
505)	04/22/19	Email Chain between W. Lapierre & M. Dycio dated April 22, 2019	NRA_DYCIO00000464	
506)	04/22/19	Letter - Winkler to WLP	NRA-AMc_00091615-91620 NRA-AMc_00069693-69697 AMc-035326	
507)	04/22/19	Letter - Winkler to WLP	NRA-AMc_00091620-91624 NRA-AMc_00069701-69703	
508)	04/24/19	Text - Boren to Hallow	DB_0265 (Boren 14)	Hearsay – FED. R. EVID. 801, 802
509)	04/24/19	Email - Hallow to North	NRA-AMc_0061214	Hearsay – FED. R. EVID. 801, 802
510)	04/25/19	Email - Boren to Anoatubby	DB_0245-249	Hearsay – FED. R. EVID. 801, 802
511)	04/25/19	Text - Ed Martin to Boren	DB_0269	
512)	04/25/19	Email - North to Frazer	NRA-AMc_00069192-69233 NRA-AMc_00064609-64650, OLN00134-136	
513)	04/25/19	Invoices 165527 - 165552	NRA-AMc_00079051 - NRA-AMc_00079058	
514)	04/25/19	Letter - WLP to Board members	NRA-AMc_00161960-161962 OLN00089-OLN91	
515)	04/26/19	Email - Hart to Makris	AMc-035417-35419	
516)	04/26/19	Invoices_165582-165587	NRA-AMc_00079068 - NRA-AMc_00079073	
517)	04/26/19	Article - Danny Hakim, In N.R.A. Power Struggle, Insurgents Seek to Oust Wayne LaPierre, The New York Times		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
518)	04/26/19	2019-04-26_Ferate to NRA counsel		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
519)	04/27/19	Article - Mark Maremont, New York Attorney General Probes NRA as Oliver North Exits as President, The Wall Street Journal		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
520)	04/28/19	Email - Cooper to Hart re article in New York Times "N.R.A. President to Step Down as New York Attorney General Investigates" by Danny Hakim	NRA-AMc_00185755-185758	
521)	04/29/19	Millie Hallow's Email attaching notes from extortion call	NRA-AMc_00059595	Hearsay – FED. R. EVID. 801, 802
522)	04/29/19	Millie Hallow's Extortion Notes Attachment	NRA-AMc_00059596-97	Hearsay – FED. R. EVID. 801, 802
523)	04/29/19	NRA Board Meeting Minutes	NRA-AMc_00199814	Relevance – FED. R. EVID. 401, 402
524)	04/29/19	Audit Committee Report re Audited Financial Statements	NRA-BK-00068876-90	
525)	04/29/19	Audit Committee Report to BOD	NRA-BK-00097942-55	
526)	04/29/19	Article - Eli Watkins and Kate Sullivan, New York Attorney General investigating NRA finances amid group's internal dispute, CNN		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
527)	05/01/19	Invoice No. 166340 re "Talent Fee"	AMc-041863 AMc-042136	

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
528)	05/01/19	Email - Brandon Winkler's approval of the cost re North's American Heroes shoot	AMc-058215	Relevance – FED. R. EVID. 401, 402
529)	05/01/19	Declaration - Bill Powers	NRA-AMc_00064991-00064992	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
530)	05/02/19	Inoicse 165567	NRA-AMc_00079060	
531)	05/02/19	Article - Mark Maremont, NRA Chief Wayne LaPierre Questioned on Travel Expenses, The Wall Street Journal		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
532)	05/03/19	Kovensky, Josh, "WSJ: NRA Chief Asked About Bills for Expensive Suits, Overseas Travel, Talking Points Memo, May 3, 2019 (https://talkingpointsmemo.com/muckraker/wayne-lapierre-travel-expenses-nra).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
533)	05/05/19	Email from W. LaPierre to M. Hill at Ackerman, cc to A. Arulanandam (Official Spokesperson)		
534)	05/06/19	Email - Arulanandam to Winkler re AMc Form Declarations to various AMc employees requesting them to affirm they did not leak information to media	NRA-AMc_00064986	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
535)	05/06/19	Letter - Arulanandam to Winkler re Recent Confidentiality Violations and Requested Affirmations	NRA-AMc_00064989-00064990	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
536)	05/07/19	D. Schertler email and letter to A. Arulanandam	NRA-AMc_00140631	Relevance – FED. R. EVID. 401, 402
537)	05/09/19	A. Arulanadam email to D. Schertler,	NRA-AMc_00059637 - 38	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
538)	05/09/19	American Heroes planned release schedule	AMcTX-00003938-3942	
539)	05/09/19	Email - Email from Arulanandam to Montgomery and H. Martin	AMcTX-00042984	
540)	05/09/19	2019-05-09 Email from AA to MM re NRATV	NRA-AMc_00059652	
541)	05/09/19	Note (handwritten) - Grable to WLP re 2019 YTD monetization numbers ("not much activity")	NRA-AMc_00140551	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Optional Completeness – FED. R. EVID. 106 (attachments missing)
542)	05/10/19	American Heroes Sponsorship Status	AMcTX-00003263	
543)	05/10/19	NRATV Powerpoint Presentation - NRATV 2019 Update	AMcTX-00020114 / AMc-041806	
544)	05/10/19	2019-05-10 Email from MM to AA re Analytics	NRA-AMc_00086579	
545)	05/10/19	Audit Committee Report	NRA-BK-00098441	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
546)	05/10/19	[FW: Final Materials] [NRATV-AnalyticsDeck-051019-RV16.pdf] NRATV 2019 Update for the period Jan 1 - May 1		
547)	05/11/19	Maremont, Mark, "Leaked Letters Reveal Details of NRA Chief's Alleged Spending, Wall Street Journal, May 11, 2019 (https://www.wsj.com/articles/leaked-letters-reveal-details-of-nra-chiefs-alleged-spending-11557597601).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
548)	05/11/19	Brigham, Bob, "BUSTED: National Rifle Association caught spending \$275,000 at Beverly Hills boutique – on suits for Wayne LaPierre," rawstory.com, May 11, 2019 (https://www.rawstory.com/2019/05/busted-national-rifle-association-caught-spending-275000-at-beverly-hills-boutique-on-suits-for-wayne-lapierre/).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
549)	05/11/19	Article - Mark Maremont, Leaked Letters Reveal Details of NRA Chief's Alleged Spending, The Wall Street Journal		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
550)	05/11/19	Maremont, Mark, "Leaked Letters Reveal Details of NRA Chief's Alleged Spending,"		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
551)	05/12/19	Richardson, John, "Ack-Mac Letter Regarding LaPierre Expenses," Onlygunsandmoney.com, May 12, 2019 (https://onlygunsandmoney.com/2019/05/12/ack-mac-letter-regarding-lapierre.html).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
552)	05/13/19	Email - Hakim (New York Times) to Powers	AMc-010950	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802

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Exhibit	Date	Description	Bates numbers	AMc Objection(s)
553)	05/13/19	Letter Package - Montgomery to Arulanandam	AMcTX-00003309 (letter) AMcTX-00003282-3308 (NRA TV 2019 Update) AMcTX-00003262-3281 (NRATV 2018 Media Valuation)	
554)	05/13/19	AMc Letter	AMcTX-00003970	
555)	05/13/19	Email - H. Martin to Van Horn	AMcTX-00048657	Relevance – FED. R. EVID. 401, 402
556)	05/13/19	Email - H. Martin to Van Horn	AMcTX-00048659	Relevance – FED. R. EVID. 401, 402
557)	05/13/19	Puckett, Lily, “Wayne LaPierre spent hundreds of thousands from NRA funds on suits and travel, leaked documents show,” Independent, May 13, 2019 (https://www.independent.co.uk/news/world/americas/nra-leaked-documents-wayne-lapierre-suit-travel-expenses-a8910771.html).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
558)	05/13/19	Wolf, Cam, “The CEO of the NRA Spent Almost \$300,000 on Suits,” GQ, May 13, 2019 (https://www.gq.com/story/nra-ceo-wayne-lapierre-suits).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
559)	05/13/19	Kutsch, Tom, “Read the Leaked NRA Docs that Detail Wayne LaPierre’s Lavish Spending,” The Trace, May 13, 2019 (https://www.thetrace.org/newsletter/leaked-nra-documents-wayne-lapierre-lavish-spending/).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
560)	05/13/19	Madden May, Pete, “NRA infighting spills into public view with anonymous leak of documents,” abcnews.go.com, May 13, 2019 (https://abcnews.go.com/Politics/nra-infighting-spills-public-view-anonymous-leak-documents/story?id=63012618).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
561)	05/13/19	Silverstein, Ken, “Exclusive: Did the head of the NRA have an intimate relationship with a Russian spy and have his group pay her apartment rent,” WashingtonBabylon.com, May 13, 2019 (https://washingtonbabylon.com/exclusive-did-the-head-of-the-nra-have-an-intimate-relationship-with-a-russian-spy-and-have-his-group-pay-her-apartment-rent/).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
562)	05/13/19	Silverstein, Ken, “Exclusive: Did the head of the NRA have an intimate relationship with a Russian spy and have his group pay her apartment rent?”, May 13, 2019 (https://washingtonbabylon.com/exclusive-did-the-head-of-the-nra-have-an-intimate-relationship-with-a-russian-spy-and-have-his-group-pay-her-apartment-rent/).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
563)	05/13/19	DTwyman (@dtwyman), Twitter (May 13, 2019) (photo of Ms. Allen on a pink flamingo in a pool).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
564)	05/14/19	Email - Powers to Hakim (New York Times) saying "Hang in there and I promise you'll get more than an emailed statement."	AMc-009682	Relevance – FED. R. EVID. 401, 402
565)	05/14/19	Email - Revan forwards 5/13/19 email from Hakim to Angus	AMcTX-00003310	Relevance – FED. R. EVID. 401, 402
566)	05/14/19	Christensen, Dan, “NRA pays lobbyist Marion Hammer big bucks, but you won’t find that disclosed in Tallahassee,” Floridabulldog.org, May 14, 2019 (https://www.floridabulldog.org/2020/07/nra-lobbyist-marion-hammer-to-face-ethics-commission-hearing/).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
567)	05/14/19	Hakim, Danny, “At the N.R.A., a Cash Machine Sputtering,” New York Times, May 14, 2019 (https://www.nytimes.com/2019/05/14/us/nra-finances-executives-board-members.html).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
568)	05/14/19	D. Schertler sends an email to A. Arulanandam, cc J. Frazer, D. Onorato; D. Dickieson with attached letter re providing data to NYT		
569)	05/14/19	Hakim, Danny, “At the N.R.A., a Cash Machine Sputtering,” New York Times, May 14, 2019 (https://www.wsj.com/articles/leaked-letters-reveal-details-of-nra-chiefsalleged-spending-11557597601).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
570)	05/17/19	Dickinson, Tim., "Leaked Documents Reveal 'Mindboggling' Spending at the National Rifle Association, Rolling Stone, May 17, 2019 (https://www.rollingstone.com/politics/politics-features/mindboggling-spending-at-the-national-rifle-association-836980/).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
571)	05/17/19	Dickinson, Tim., "Leaked Documents Reveal 'Mindboggling' Spending at the National Rifle Association, Rolling Stone, May 17, 2019 (https://www.rollingstone.com/politics/politics-features/mindboggling-spending-at-the-national-rifle-association-836980/).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
572)	05/20/19	Email - Arulanandam to Montgomery and H. Martin	AMcTX-00042580	
573)	05/20/19	Blog regarding AMc now leaking embarrassing information about W. LaPierre	NRA-AMc_00140807	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
574)	05/21/19	Invoices AMc billed to NRA in 2015-2016 and 2018: Sixteen (16) Paid Invoices totaling \$22,356,171 relating to media buys (Invoice Nos. 130885, 133360, 133361, 133660, 133661, 133715, 134776, 135117, 135119, 136353, 137286, 137955, 137956, 141002, 156955 and 157106)	NRA-AMc_00140814	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
575)	05/22/19	Affidavit of Travis Carter, as filed in Civil Case No. CL19001757, in the Circuit Court for the City of Alexandria, Virginia		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
576)	05/23/19	NRA's Emergency Motion for Stay, filed in VA	CL1900177	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
577)	05/23/19	Swan, Betsy, "NRA Sues Advertising Firm for Alleged Media Leaks, Coup Attempt, Daily Beast, May 23, 2019 (https://www.thedailybeast.com/nra-sues-advertising-firm-ackerman-mcqueen-for-alleged-media-leaks-coup-attempt).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
578)	05/23/19	Hakim, Danny and Montague, Zach, "Ad Firm Fires Back at N.R.A. With \$50 Million Lawsuit," New York Times, May 23, 2019 (https://www.nytimes.com/2019/05/23/us/nra-ackerman-mcqueen-lawsuit.html).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
579)	05/23/19	Swan, Betsy, "NRA Sues Advertising Firm for Alleged Media Leaks, Coup Attempt, Daily Beast, May 23, 2019 (https://www.thedailybeast.com/nra-sues-advertising-firm-ackerman-mcqueen-for-alleged-media-leaks-coup-attempt).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
580)	05/23/19	Hakim, Danny and Montague, Zach, "Ad Firm Fires Back at N.R.A. With \$50 Million Lawsuit," New York Times, May 23, 2019 (https://www.nytimes.com/2019/05/23/us/nra-ackerman-mcqueen-lawsuit.html).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
581)	05/24/19	Email - Arulanandam to Montgomery	AMc-058489	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106
582)	05/29/19	Weinberg, Neil and Voreacos, David, "Ad Firm Cuts Ties with NRA, Says 'Chaos Led Us to Lose Faith' After 38 Years," Bloomberg, May 29, 2019 (https://www.bloomberg.com/news/articles/2019-05-29/nra-s-longtime-ad-agency-severs-ties-as-legal-battle-escalates).	None (article)	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
583)	05/29/19	Email - Montgomery letter to Arulanandam alleging that "[t]he NRA has, in essence, constructively terminated the Services Agreement."	NRA-AMc_00059931	
584)	05/29/19	R. McQueen email to A. Arulanandam, cc C. Spray, J.Frazier, W. LaPierre	NRA-AMc_00180311-180315	
585)	05/29/19	A. Arulanandam letter to R. McQueen	NRA-AMc_00180347	

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
586)	05/29/19	Statement from Ackerman McQueen		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37©
587)	05/30/19	Audit Committee resolution rescinding approval on North Contract	AMc-022072-22073 NRA-AMc_00069739-69740	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
588)	05/30/19	Audit Committee Report Draft	NRA-AMc_00071202-05	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
589)	05/30/19	M. Montgomery email to A. Arulanandam		
590)	05/31/19	Arulanandam email to Montgomery re NRATV	NRA-AMc_00059956-57	Hearsay – FED. R. EVID. 801, 802
591)	06/01/19	Invoice No. 167038 re "Talent Fee"	AMc-042052	
592)	06/03/19	B. Winkler email to C. Spray, cc W. LaPierre, A. Arulanandam and J. Frazer	NRA-AMc_00180783-85	
593)	06/03/19	Declaration - Powers dated 06/03/19		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
594)	06/04/19	D. Schertler email to J. Frazer, cc to NRA and Ackerman Staff	NRA-AMc_00180828-31	
595)	06/05/19	A. Arulanandam email and letter to B. Winkler	NRA-AMc_00180873-78	Hearsay – FED. R. EVID. 801, 802
596)	06/11/19	Letter - Arulanandam to Montgomery re AMc invoices and wind-down	NRA-AMc_00060122-60123	Hearsay – FED. R. EVID. 801, 802
597)	06/13/19	Memo (draft) - Analysis of the 2018 NRA Consolidated Financial Statement	NRA-AMc_00071065-710077 NRA-AMc_00069887-00069999	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
598)	06/14/19	Letter from A. Arulanandam to D. Schertler		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
599)	06/17/19	A. Arulanandam email to M. Montgomery with cc to A. McQueen, R. McQueen and D. Schertler	NRA-AMc-00070032	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
600)	06/17/19	Letter - W. Brewer to Frazer re Amendment to Engagement Letter Dated March 5, 2018	NRA-BK-00060639-60647	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
601)	06/18/19	D. Schertler email to A. Arulanandam, M. Montgomery, cc A. McQueen and R. McQueen	NRA-AMc-00070036	
602)	06/18/19	A. Arulanandam email to D. Schertler and M. Montgomery; cc to A. McQueen and R. McQueen	NRA-AMc-00070049	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
603)	06/18/19	D. Schertler email to A. Arulanandam, M. Montgomery,, cc A. McQueen and R. McQueen	NRA-AMc-00070054	
604)	06/25/19	Article - Danny Hakim, NRA Shuts Down Production of NRATV, The New York Times		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
605)	06/26/19	Statement-From-Ackerman-McQueen		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37(c)
606)	06/28/19	Deposition Transcript - Robert Pincus, on 06/28/2019 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
607)	06/30/19	AMc Weekly Time Sheets of Caile Turner from Jan 2018 thru June 2019 (Project/Campaign redacted from certain billings)	AMc 047065 - AMc 047144 at 7075	Relevance – FED. R. EVID. 401, 402
608)	06/30/19	Weekly Time Sheet of Clay Turner from Jan 2018 thru Jun 2019	AMc 047791 - AMc 047868	Relevance – FED. R. EVID. 401, 402
609)	06/30/19	AMc Weekly Time Sheets of Eric Van Horn from Jan 2018 thru June 2019	AMc 049136 - AMc 049212	Relevance – FED. R. EVID. 401, 402
610)	06/30/19	AMc Weekly Time Sheets of Michael Ives from Jan 2018 thru June 2019	AMc 053074 - AMc 053150	Relevance – FED. R. EVID. 401, 402
611)	06/30/19	AMc Weekly Time Sheets of Patrick Kobler from Jan 2018 thru June 2019	AMc 053812 - AMc 053889	Relevance – FED. R. EVID. 401, 402

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
612)	07/03/19	Statement from Ackerman McQueen		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37(c)
613)	07/08/19	Daily NRA TV Email Stats - Jan 2018 - Dec 2018	NRA-AMc 00127208	Relevance – FED. R. EVID. 401, 402
614)	07/08/19	Deposition transcript - Anthony Ferate on 07/08/19 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
615)	07/15/19	Deposition Transcript - John Popp, on 07/15/2019 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
616)	08/30/19	AMc produced daily time records for 2018 that includes “NR, NRAF, NRZ, and NI Hours”	AMc 001476 - AMc 002426	Relevance – FED. R. EVID. 401, 402
617)	08/30/19	Statement from Ackerman McQueen		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37(c)
618)	08/30/19	Plaintiff's Original Complaint, ECF 1		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
619)	09/13/19	Statement from AMc		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37(c)
620)	09/13/19	Statement from Ackerman McQueen		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37(c)
621)	09/14/19	NRA Board Meeting Minutes		Relevance – FED. R. EVID. 401, 402; Failure to timely produce – FED. R. CIV. P. 37(c)
622)	09/18/19	Deposition transcript - Michael Trahar on 09/18/19 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
623)	09/24/19	Deposition transcript - Wayne LaPierre on 09/24/19 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
624)	09/26/19	Deposition Transcript - Ron Carter, on 09/26/2019 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
625)	09/27/19	Production Invoice No. 169859	AMcTX-00044273-91	
626)	09/27/19	Letter - Montgomery to Arulanandam	AMcTX-00044292-45352	
627)	09/30/19	Letter from D. Dickieson to M Collins		
628)	10/01/19	Email - R. Charnley to B. Brewer		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)
629)	10/01/19	Defendant Ackerman McQueen, Inc.'s Original Answer, Counterclaim, and Third Party Complaint against Wayne LaPierre, ECF 12		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
630)	10/01/19	AMc's Motion to Compel the Production of Documents from Third-Party FRA, filed in the VA matter, Case Nos. CL19001757, CL19002067, and CL19002886 (Cir. Ct. Va. 2019)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
631)	10/02/19	Deposition Transcript - Andrew Arulanandam, on 10/02/2019 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
632)	10/03/19	Deposition transcript - Craig Spray on 10/03/19 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
633)	10/23/19	The NRA and Ackerman McQueen_ One of the Strongest Relationships in Adland _ AdAge		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
634)	10/25/19	Plaintiff's First Amended Complaint, ECF 18		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
635)	10/25/19	Plaintiff the National Rifle Association of America's Answer to Defendant Ackerman McQueen, Inc.'s Counterclaim, ECF 17		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
636)	10/28/19	Statement from Ackerman McQueen		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37(c)
637)	10/29/19	Statement from Ackerman McQueen		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37(c)
638)	11/05/19	NRA's First Set of Requests for Production		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
639)	11/08/19	NRA's Memorandum of Law in Opposition to AMc's Motion to Compel Production of Documents from Third-Party FRA, dated 11/8/19, filed in the VA matter		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
640)	11/13/19	Declaration of John Frazer		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
641)	11/13/19	Hearing transcript - National Rifle Association of America v. Ackerman McQueen, Inc. et al., Cons. Case Nos. CL19001747, CL19002067, CL19002886 (Cir. Ct. Va. 2019), on 11/13/19		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
642)	11/15/19	Defendants' Amended Answer and Defendant/Counter-Plaintiff Ackerman McQueen, Inc.'s Amended Counterclaim and Third-Party Complaint, ECF 31		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
643)	12/10/19	Declaration of G. Stinchfield dated December 10, 2019		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
644)	12/18/19	Deposition transcript - Oliver North on 12/18/19 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
645)	12/23/19	Plaintiff National Rifle Association of America's Answer to Defendant Ackerman McQueen, Inc.'s Amended Counterclaim, ECF 41		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
646)	12/28/19	Statement from Ackerman McQueen		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37(c)
647)	12/28/19	AMc Statement, Dec. 28, 2019, The Oklahoman – “Will NRA Get Insider Info.”		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
648)	12/31/19	2019 AMc consolidated statement of income	AMcTX00053204-53105	Relevance – FED. R. EVID. 401, 402
649)	12/31/19	2019 AMc's redacted record of "Inside Labor Cost," "Labor Hours," "Overhead Allocation," and "Misc Direct and T&E Total" for the NRA and all AMc clients	AMcTX-00053206-53115	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
650)	12/31/19	2019 AMc financial statements (audited)	AMcTX-00068074-68092	Relevance – FED. R. EVID. 401, 402
651)	01/10/20	Deposition transcript - Millie Hallow on 01/10/20 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
652)	01/16/20	Deposition transcript - John Frazer on 01/16/20 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
653)	01/29/20	Deposition transcript - Carolyn Meadows on 01/29/20 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
654)	01/29/20	NRA's Fourth Set of Requests for Production		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
655)	02/03/20	NRA's Second Set of RFP		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
656)	02/03/20	NRA's Second Set of Requests for Production		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
657)	02/04/20	Deposition Transcript - Steven Hart on 02/04/20 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
658)	02/07/20	Deposition Transcript - Charles Cotton, on 02/07/2020 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
659)	02/11/20	Email response to subpoena directed to Workamajig	n/a	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
660)	02/21/20	AMc's Responses and Objections to NRA Fourth Set of RFP's in VA		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
661)	02/24/20	Statment from Ackerman McQueen - Wall Street Journal		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Optional Completeness – FED. R. EVID. 106; Failure to timely produce – FED. R. CIV. P. 37(c)
662)	03/04/20	Letter - Frazer to Betts	NRA-AMc 00199046-199047	
663)	03/04/20	ECF 122 at Ex. 36, Declaration of Travis Carter [Appendix 184-186].		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
664)	03/26/20	AMc's Responses and Objections to NRA Second Set of RFP's		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
665)	03/26/20	NRA's Revised Second Set of RFP		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
666)	03/26/20	Defendants' Objections and Responses to Plaintiffs's Second Set of Requests for Production		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
667)	03/30/20	Declaration - McQueen Revan		
668)	04/14/20	Declaration of Andrew Arulanandam		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
669)	04/29/20	Declaration of Michael Erstling		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
670)	04/30/20	Declaration of G. Stinchfield dated April 30, 2020		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
671)	05/01/20	Declaration of John Frazer		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
672)	05/04/20	Declaration - Spray dated 05/04/20		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
673)	05/06/20	An essential marketing tool in a downturn: Spend management by McKinsey & Company		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
674)	05/28/20	Letter - Childress to NRA Hearing Board re coup / North	No bates, LtCol North Submission 112, 116, 120	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
675)	06/03/20	Declaration - Makris		
676)	06/17/20	Deposition transcript - Wayne LaPierre on 06/17/20 (NYAG)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
677)	06/25/20	Bergin's affidavit in the Ultra Petroleum Corp. case		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
678)	08/06/20	NYAG v. NRA Complaint, ECF 448-5		
679)	08/06/20	NYAG v. NRA Complaint, ECF 448-5		
680)	08/07/20	Declaration of Susan Dillon		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
681)	08/11/20	NRA's Amended Complaint against North, ECF 18, filed in NY		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
682)	08/21/20	NRATV Analytics, pulled on 08/21/20	AMcTX-00003158	Relevance – FED. R. EVID. 401, 402
683)	08/21/20	Court Order in re Ultra Petroleum Corp.		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
684)	08/24/20	Memorandum Of Law In Opposition To The Attorney General's Special Proceeding And Application To Compel Respondent Ackerman McQueen To Comply With An Investigatory Subpoena NYSCEF DOC. NO. 25 Index # 451825/2019		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
685)	08/31/20	North's Answer to Amended Complaint (NRA vs. North), ECF 41, filed in NY		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
686)	09/03/20	Marketing Metrics, The Manager's Guide to Measuring Marketing Performance, Fourth Edition by Neil T. Bendle, Paul W. Farris, Phillip E. Pfeifer, and David J. Reibstein		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
687)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 85 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
688)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 193 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
689)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 91 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
690)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 98 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
691)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 96 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
692)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 101 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
693)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 102 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
694)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 91 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
695)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 92 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
696)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 165 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
697)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 183 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
698)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 185 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
699)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 187 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
700)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 232 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
701)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 198 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
702)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 199 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
703)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 201 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
704)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 205 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
705)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 216 (2020).		Optional Completeness – FED. R. EVID. 106 Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
706)	10/09/20	Email - Alexander (Williams & Connoll LLP) to SME re North's compensation in 2019		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
707)	11/03/20	Deposition transcript - Dan Boren on 11/03/20 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
708)	12/09/20	AMc's Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
709)	12/15/20	Email - Kelsey (Dorsey) to BAC re privilege log which is attached		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
710)	01/06/21	AMc's Supplemental Categorical Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
711)	02/24/21	AMc's stockholder listing	BANA AMI000292	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
712)	03/12/21	NRA's Second Amended Complaint, ECF 209, filed in TX		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
713)	03/12/21	NRA's Second Amended Complaint, ECF 209, filed in TX		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
714)	03/14/21	Email - Claudia Colon Garcia-Moliner to B. Mason regarding NRATV Social Media Account log in credentials	NRA-AMc_00185706	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
715)	03/15/21	Deposition Transcript - John Frazer 30(b)(6) on 03/15/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
716)	03/18/21	Deposition transcript - John Frazer on 03/18/21 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
717)	03/18/21	Deposition Transcript - Hon. Phillip Journey on 03/18/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
718)	03/19/21	Deposition Transcript - Wilson Phillips, on 03/19/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
719)	03/19/21	Deposition Transcript - Sonya Rowling, Individual and 30(b)(6), on 03/19/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
720)	03/22/21	Deposition Transcript - Wayne LaPierre, Individual and 30(b)(6) on 03/22/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
721)	03/23/21	Deposition transcript - Wayne LaPierre on 03/23/21 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
722)	03/23/21	Deposition Transcript - William Wang 30(b)(6) on 03/23/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
723)	03/24/21	Deposition Transcript - Tony Makris, on 03/24/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
724)	03/24/21	Deposition Transcript - Craig Spray, on 03/24/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
725)	03/25/21	Deposition transcript - Gayle Stanford on 03/25/21 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
726)	03/26/21	Deposition transcript - Bill Winkler (30b6) on 03/26/21 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
727)	03/26/21	Deposition Transcript - Bill Winkler (Fact) on 03/26/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
728)	03/26/21	Deposition Transcript - William Winkler, dated 03/26/2021 (CH 11), at 107:10-108:9		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
729)	03/27/21	Deposition Transcript - Charles Cotton, on 03/27/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
730)	03/28/21	Deposition Transcript - Charles Cotton, on 03/28/2021 (CH 11)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
731)	03/31/21	Deposition transcript - Melanie Montgomery (30b6) on 03/31/21 (VA)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
732)	04/08/21	Hearing Transcript - Amended Transcript of Motion to Dismiss Case (CH 11) - 04/08/21 PM session		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
733)	04/08/21	Letter- A. Allegretto to B. Mason		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
734)	04/16/21	Hearing transcript - Chapter 11 on 04/16/21 AM session (CH 11 trial)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
735)	04/16/21	Hearing transcript - In Re: National Rifle Association of America and Sea Girt, LLC, Case No. 21-30085 (N.D. Tex. 2021), on 04/16/21 (PM session)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
736)	04/20/21	Hearing Transcript - Amended Transcript of Motion to Dismiss Case (CH 11) - 04/20/21 AM session		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
737)	04/21/21	Hearing transcript - Chapter 11 on 04/21/21 PM session (CH 11 trial)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
738)	04/21/21	Hearing transcript - Michael Erstling on 04/21/21 (CH 11 trial)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
739)	04/23/21	Declaration of G. Stinchfield dated April 23, 2021		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
740)	05/11/21	Bankruptcy Court Order		
741)	05/17/21	Defendants' Answer to Plaintiff's Second Amended Complaint		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
742)	05/22/21	Counter-Plaintiff Ackerman McQueen, Inc.'s Second Amended Counterclaim, ECF 241		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
743)	05/22/21	Counter-Plaintiff Ackerman McQueen, Inc.'s Second Amended Counterclaim		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
744)	06/01/21	Goolsby - Expert Report		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
745)	06/01/21	Hochman - Expert Report		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
746)	06/01/21	Expert Report - Mclean		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
747)	06/15/21	Jackson - Expert Report		
748)	06/15/21	Expert Report - Klink		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
749)	06/21/21	NRATV Analytics, pulled on 06/21/21	AMcTX-00047766	Relevance – FED. R. EVID. 401, 402
750)	06/27/21	NRATV Analytics, pulled on 06/27/21	AMcTX-00061114	Relevance – FED. R. EVID. 401, 402
751)	07/01/21	Bergin - Expert Rebuttal Report		
752)	07/01/21	Jackson - Expert Rebuttal Report		
753)	07/06/21	Declaration of Brian Mason		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
754)	07/15/21	Kanter - Expert Rebuttal Report		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
755)	07/15/21	Kraus - Expert Rebuttal Report		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
756)	07/26/21	Deposition transcript - Steven Hart on 07/26/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
757)	07/27/21	Deposition transcript - Christopher Cox on 07/27/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
758)	07/28/21	Deposition transcript - Susan Dillon on 07/28/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
759)	07/30/21	Deposition transcript - Brandon Winkler on 07/30/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
760)	07/31/21	Letter - Brian E. Mason to Sarah Rogers, Philip J. Furia and Jason Clouser		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
761)	08/02/21	Declaration of Todd Grable		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
762)	08/02/21	Deposition transcript - Andrew Arulanandam 30(b)(6) on 08/02/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
763)	08/02/21	Deposition transcript - John Frazer 30(b)(6) on 08/02/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
764)	08/02/21	Deposition transcript - Bill Powers on 08/02/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
765)	08/03/21	Letter - Philip J. Furia to Brian E. Mason		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
766)	08/03/21	Declaration of Charles Cotton with Exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
767)	08/03/21	Declaration of John Frazer with Exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
768)	08/04/21	Deposition of Melanie Montgomery	N/A	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
769)	08/04/21	Deposition transcript AMc 30(b)(6) (Bill Winkler, Melanie Montgomery and Brian Darley) on 08/04/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
770)	08/04/21	Deposition transcript - Nader Tavangar on 08/04/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
771)	08/05/21	Deposition transcript - Lacey Cremer (Duffy) on 08/05/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
772)	08/05/21	Deposition transcript - Tony Makris on 08/05/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
773)	08/05/21	Deposition transcript - Ed Martin on 08/05/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
774)	08/06/21	Letter - Philip J. Furia to Brian E. Mason		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
775)	08/06/21	Deposition transcript - Melanie Montgomery on 08/06/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
776)	08/10/21	Deposition transcript - Jonathan Hochman on 08/10/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
777)	08/10/21	Deposition transcript - Hochman on 08/10/21		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
778)	08/11/21	Deposition transcript - Skye Brewer on 08/11/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
779)	08/12/21	Deposition transcript - Larry Kanter on 08/12/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
780)	08/13/21	Deposition Transcript - Matthew Klink, on 08/13/2021 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
781)	08/15/21	Email - SBR to Mason re Experts / Scheduling		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
782)	08/16/21	Email from B. Mason to P. Furia regarding NRATV overhead / costs		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
783)	08/16/21	Goolsby - Supplemental Expert Report		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
784)	08/17/21	Letter - Jason Clouser to Brian E. Mason re Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
785)	08/17/21	Deposition transcript - Gary Goolsby on 08/17/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
786)	08/18/21	Publication - Vanity Metrics: Definition, How To Identify Them, And Examples, Tableau website		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
787)	08/18/21	Publication - Vanity Metrics: Definition, How To Identify Them, And Examples, Tableau website		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
788)	08/19/21	Deposition transcript - John Frazer on 08/19/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
789)	08/19/21	Deposition transcript - Autumn Kraus on 08/19/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
790)	08/20/21	Deposition transcript - Richard Bergin on 08/20/21 (TX)		FED. R. CIV. PRO. 32(a)
791)	08/20/21	Deposition transcript - Wayne LaPierre on 08/20/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
792)	08/20/21	2020 AMc Tax Return		
793)	08/23/21	Email - Carroll to SBR, PJF, SME and JFC		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
794)	08/23/21	Deposition transcript - Revan McQueen on 08/23/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
795)	08/24/21	Email - SBR to Carroll, PJF, SME and JFC		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
796)	08/25/21	Letter - Sarah B. Rogers to Brian E. Mason		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
797)	08/25/21	Letter - Sarah B. Rogers to Brian E. Mason re "Highly Confidential" Designations		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
798)	08/26/21	Email - Cady to Mason, SBR and PJF h		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
799)	08/27/21	Deposition transcript - Andrew Arulanandam 30(b)(6) on 08/27/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
800)	08/27/21	Deposition transcript - Michael Erstling 30(b)(6) on 08/27/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
801)	08/30/21	Deposition transcript - John Frazer on 08/30/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
802)	08/30/21	Deposition transcript - Wilson Phillips on 08/30/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
803)	08/30/21	Counter-Defendant National Rifle Association of America's Answer to Counter-Plaintiff Ackerman McQueen, Inc.'s Second Amended Counterclaim, ECF 340		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
804)	08/31/21	Declaration - Meadows dated 08/31/21		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
805)	08/31/21	Deposition transcript - Rick Tedrick on 08/31/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
806)	08/31/21	NRA's Status Report on Outstanding Discovery Issues, ECF 342		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
807)	08/31/21	AMc's Status Report dated August 31, 2021		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
808)	08/31/21	AMc's Status Report dated August 31, 2021		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
809)	09/01/21	Letter - Brian E. Mason to Sarah B. Rogers ("PIP Dashboard Access Letter")		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
810)	09/01/21	Declaration of Brian Buss		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
811)	09/01/21	Declaration of Jason Clouser With Exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
812)	09/01/21	Declaration of John Frazer		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
813)	09/01/21	Declaration of John Frazer		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
814)	09/01/21	Declaration of Todd Grable (Corrected Version with Exhibits)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
815)	09/01/21	Declaration - LaPierre		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
816)	09/01/21	Declaration - Arulandanam		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
817)	09/01/21	Letter - Brian E. Mason to Sarah B. Rogers ("PIP Dashboard Access Letter")		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
818)	09/03/21	Letter - Cecelia L. Fanelli to Brian E. Mason re PIP Dashboard, Server, and NRATV Social Media Login Credentials		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
819)	09/03/21	NRA's Supplemental Status Report Letter to Judge Fish, ECF 354		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
820)	09/03/21	U.S. District Court for the Western District of Oklahoma Order to Transfer AMc's Motions to Quash long-outstanding third-party subpoenas by the NRA to a former AMc employee, Tamara Payne, and to AMc's auditors at HBC, to the U.S. District Court, Northern District of Texas (Dallas), ECF 355		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
821)	09/08/21	Email - Werbner to PJF re Phillips deposition		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
822)	09/09/21	Letter - Cecelia L. Fanelli to Brian E. Mason re NRA Dashboard, Server, and NRATV Social Media Login Credentials		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
823)	09/09/21	Letter - Cecelia L. Fanelli to Brian E. Mason re NRA Dashboard, Server, and NRATV Social Media Login Credentials		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
824)	09/10/21	Letter from B. Mason to J. Clouser and S. Rogers dated September 10, 2021		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
825)	09/10/21	Letter - Brian E. Mason to Jason Clouser re Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
826)	09/12/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
827)	09/12/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
828)	09/14/21	Letter - Cecelia L. Fanelli to Brian E. Mason re NRA Dashboard, Server, and NRATV Social Media Login Credentials		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
829)	09/14/21	Letter - Cecelia L. Fanelli to Brian E. Mason re NRA Dashboard, Server, and NRATV Social Media Login Credentials		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
830)	09/15/21	Oliver North Depo. Memorandum	NRA-BK-00177963-00177967	
831)	09/15/21	Deposition transcript - Oliver North on 09/15/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
832)	09/16/21	Hearing transcript - Status Conference re outstanding discovery on 09/16/21		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
833)	09/17/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Server, NRATV Social Media Accounts Login Credentials, and Goolsby Deposition		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
834)	09/17/21	Letter - Cecelia L. Fanelli to Martin C. Geagan (Winston & Strawn LLP)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
835)	09/17/21	Letter - Philip J. Furia to Mark Werbner re Phillips deposition		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
836)	09/17/21	Letter - Brian E. Mason to Sarah B. Rogers re Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
837)	09/17/21	NRA's Weekly Status Report, ECF 365		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
838)	09/17/21	AMc's First Amended Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
839)	09/21/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
840)	09/21/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Goolsby Deposition and Proposal for Forensic Neutral		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
841)	09/21/21	AMc's First Amended Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
842)	09/21/21	Letter - Brian E. Mason to Cecelia L. Fanelli		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
843)	09/22/21	Letter - Sarah B. Rogers to Brian E. Mason		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
844)	09/23/21	Letter - Sarah B. Rogers to Brian E. Mason re correspondence		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
845)	09/23/21	Letter - Cecelia L. Fanelli to Brian E. Mason		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
846)	09/23/21	Email - MXG to Werbner and Farber		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
847)	09/23/21	Letter - Brian E. Mason to Sarah B. Rogers		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
848)	09/24/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Response to Mason's 9/21/21 letter		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
849)	09/24/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Dashboard Safety Concerns		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
850)	09/24/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Mclean deposition		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
851)	09/24/21	Letter - Brian E. Mason to Sarah B. Rogers re Depositions and FRA		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
852)	09/24/21	NRA's Weekly Status Report, ECF 377		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
853)	09/24/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Dashboard Safety Concerns		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
854)	09/28/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
855)	09/28/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
856)	10/01/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Response to Mason's 09/28/21 letter		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
857)	10/01/21	Letter - Sarah B. Rogers to Brian E. Mason re Document Production Gaps, Custodian-of-Records Deposition, FRA, and AMc's Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
858)	10/01/21	AMc Production Volume 16		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
859)	10/01/21	NRA's Weekly Status Report, ECF 380		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
860)	10/04/21	Letter - Alessandra P. Allegretto to Christina M. Carroll re Buss Deposition		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
861)	10/05/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Retention of Forensic Neutral		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
862)	10/07/21	Email - SBR to Mason re NRA v. AMc et al / Discovery		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
863)	10/08/21	Letter - Brian E. Mason to Sarah B. Rogers and Cecelia L. Fanelli re Privilege Logs, Third-Party Vendor, and FRA Documents		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
864)	10/08/21	NRA's Weekly Status Report, ECF 385		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
865)	10/08/21	Joint Status Report on the NRA's Motion to Compel the Depositions of AMc's 30b6 Representative(s) and Records Custodians, ECF 385-1		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
866)	10/11/21	Email - Kelsey to SBR and CLF re Epiq Forensics		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
867)	10/11/21	Ex N1 to Spofford Decl - Letter from C. Fanelli to B. Mason re Additional NRA Dashboard		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
868)	10/12/21	Deposition transcript - Gary Goolsby on 10/12/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
869)	10/13/21	Email - SBR to Mason, Carroll and Kelsey re FRA production		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
870)	10/13/21	Letter - Laura E. Krabill (Ballard Spahr LLP) to Cecelia L. Fanelli re Qlik Objections		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)
871)	10/14/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Retention of Forensic Neutral		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
872)	10/14/21	Letter - Alessandra P. Allegretto to Martin C. Geagan		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
873)	10/15/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Third Party Vendor Imaging of PIP Dashboard and Social Media Accounts		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
874)	10/15/21	Letter - Brian E. Mason to Cecelia L. Fanelli		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
875)	10/15/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Third Party Vendor Imaging of PIP Dashboard and Social Media Accounts (in response to Mason's 10/15/21 letter)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
876)	10/15/21	Ex N2 to Spofford Decl - Response Letter from B. Mason to C. Fanelli re Additional NRA Dashboard		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
877)	10/15/21	Email - Carroll to SBR re Status of AMc's Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
878)	10/15/21	NRA's Weekly Status Report, ECF 388		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
879)	10/15/21	Jackson - Amended Expert Report		
880)	10/16/21	Email - Mason to SBR, Carroll and Kelsey re Jackson deposition		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
881)	10/17/21	Letter - Sarah B. Rogers to Brian E. Mason re Jackson deposition and AMc's late productions		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
882)	10/18/21	Declaration of Brian E. Mason dated October 18, 2021		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
883)	10/18/21	Expert Report - Mclean (Supplemental Expert Report)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
884)	10/19/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard and Social Media Accounts		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
885)	10/19/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard and Social Media Accounts		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
886)	10/20/21	Letter - Brian E. Mason to Sarah B. Rogers re Jackson Deposition		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
887)	10/21/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Epiq Global, Inc.		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
888)	10/21/21	Letter - Sarah B. Rogers to Brian E. Mason re AMc's objections to FRA production		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
889)	10/21/21	Deposition transcript - Andrew Mclean on 10/21/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
890)	10/21/21	Deposition transcript - Wilson Phillips on 10/21/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
891)	10/21/21	Buss - Amended and Updated Expert Report		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
892)	10/22/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Mclean deposition		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
893)	10/22/21	AMc's Second Amended Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
894)	10/22/21	Letter - Kelsey Taylor to Sarah B. Rogers re AMc's Second Amended Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
895)	10/22/21	NRA's Weekly Status Report, ECF 390		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
896)	10/22/21	AMc's Second Amended Privilege Log		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
897)	10/22/21	Hochman - Supplemental Expert Report		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
898)	10/22/21	Figure 1 to Hochman's Supplemental Expert Report		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
899)	10/23/21	Email - Carroll to CLF, SBR and APA		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
900)	10/26/21	Letter - Sarah B. Rogers to Brian E. Mason		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
901)	10/27/21	Letter - Laura Devine (Google) to Cecelia L. Fanelli re Subpoena to Google		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Failure to timely produce – FED. R. CIV. P. 37(c)
902)	10/27/21	Deposition transcript - Daniel Jackson on 10/27/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
903)	10/29/21	Declaration of Brian Mason, dated October 29, 2021 (without exhibits)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
904)	10/29/21	Deposition transcript - Brian Buss on 10/29/21 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
905)	10/29/21	NRA's Weekly Status Report, ECF 394		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
906)	10/29/21	Supplemental Joint Status Report on AMc's Motion to Compel Forensic Risk Alliance Documents, ECF 396		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
907)	10/29/21	Bergin - Supplemental Expert Rebuttal Report		
908)	10/29/21	Jackson - Supplemental Expert Rebuttal Report		
909)	11/12/21	NRA's Supplemental Joint Status Report on AMc's MTC FRA Documents, ECF 403		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
910)	11/20/21	Declaration - Cotton With Exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
911)	11/28/21	Triton Digital STRATA website		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
912)	11/29/21	Declaration of John Frazer		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
913)	11/29/21	Declaration - Trahar dated 11/29/21		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
914)	11/29/21	Declaration - Winkler Bill dated 11/29/21		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; FED. R. CIV. PRO. 32(a)
915)	12/16/21	Screenshots of NRATV Social Media Accounts appended to Declaration of W. McLaughlin		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
916)	12/18/21	Declaration - McLaughlin with exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
917)	12/18/21	Exhibit A to McLaughling Declaration		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
918)	12/18/21	Exhibit B to McLaughling Declaration - screenshots of existing content from YouTube		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
919)	12/18/21	Exhibit C to McLaughling Declaration - screenshots of existing content from Facebook		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
920)	12/19/21	Declaration of Gary Goolsby With Exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
921)	12/19/21	Declaration - Mclean		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
922)	12/19/21	Declaration - Tedrick dated 12/19/21		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
923)	12/20/21	Declaration of Brian Buss With Exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
924)	12/20/21	Declaration of John Frazer		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
925)	12/20/21	Declaration of Jonathan Hochman With Exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
926)	12/20/21	Declaration of Larry Kanter With Exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
927)	12/20/21	Declaration of Matthew Klink With Exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
928)	12/20/21	Declaration of Autumn Kraus With Exhibits		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Inadmissible expert opinions – FED. R. EVID. 701, 702 Hearsay – FED. R. EVID. 801, 802
929)	12/20/21	Declaration - LaPierre		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
930)	12/20/21	Declaration - Meadows		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
931)	12/20/21	Declaration - Spofford dated 12/20/21		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
932)	12/20/21	Declaration - Winkler Bill dated 12/20/21		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403;
933)	12/20/21	Declaration - Winkler Brandon dated 12/20/21		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403;
934)	12/20/21	Declaration - Arulandanam		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
935)	01/03/22	Declaration - Arulandanam		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
936)	01/13/22	Letter from P. Furia to B. Mason dated January 13, 2022		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
937)	01/21/22	Letter from B. Mason to P. Furia		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
938)	01/21/22	Letter from B. Mason to P. Furia		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
939)	01/24/22	Declaration of Michael Erstling, dated January 24, 2022		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
940)	01/24/22	Declaration - Supplemental McLaughlin		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
941)	01/24/22	Declaration - Arulandanam		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
942)	01/28/22	Letter from C. Fanelli to B. Mason, dated January 28, 2022		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
943)	01/31/22	Deposition Transcript - William Brewer, on 01/31/2022 (TX)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; FED. R. CIV. PRO. 32(a)
944)	1/2/2018- 5/1/2018	Jeff Minson and Tony Makris OOP expense reports	AMc-0032589 -- AMc-0032636	Relevance – FED. R. EVID. 401, 402
945)	1-6-15- 1/10/20	Workamajig Invoices		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
946)	2011- 2019	NRA Tax Filings By Year (ProPublica)		
947)	2015- 2019	NRA Payment File Excel (Invoices: NRA payments to AMc / MG (2015 - 2019)	NRA-AMc_00185712	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
948)	3-18 to 3- 29-21	Email thread - A. Allegretto to B. Mason	NRA-AMc_00185707	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
949)		Workamajig feature overview		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
950)		Public Relations Society of America Code of Ethics		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
951)		American Association of Political Consultants Code of Professional Ethics		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
952)		List of User Names with General roles for 2018 and 2019	AMc 001329 - AMc 001332 at 1331	
953)		NR - OOP 2016, January - December	AMc-0030575	
954)		NR-OOP 2017, January - December	AMc-0031042	
955)		NR-OOP 2018, January - September	AMc-0032068	
956)		AMc IRS Form 1120	AMcTX-00067938	Relevance – FED. R. EVID. 401, 402
957)		Hallow to North that WLP will not support OLN for President	NRA-AMc 00059547 / NRA-AMc 00061214	

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
958)		Meadows handwritten notes from 04/24/19 call with OLN	NRA-AMc_00060573	Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
959)		Hallow collection of notes from North regarding 04.24.19 call	NRA-AMc_00060589	Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
960)		Hallow collection of notes from North regarding 04.24.19 call	NRA-AMc_00059595	Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
961)		AMc Agency Handbook (Personnel -- Confidentiality Policies)	Unknown	Relevance – FED. R. EVID. 401, 402; Optional Completeness – FED. R. EVID. 106
962)		North contract provided to NRA by hand		Relevance – FED. R. EVID. 401, 402
963)		Excerpt from FRA's privilege log		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Optional Completeness – FED. R. EVID. 106
964)		NRATV Powerpoint Presentation - NRATV 2016 Analytics, dated unclear	AMcTX-00050788	
965)	Various	Wayne LaPierre Handwritten Notes	NRA-AMc_00091712-91749	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
966)	Various	2015-2019 Budgets	NRA-AMc_00140814	Relevance – FED. R. EVID. 401, 402
967)	Various	PIP invoices	PIP-00003674-PIP-00003675, PIP-00000113-PIP-00000115-IP-00000118, PIP-00003606-PIP-00003609, PIP-00003611-PIP-00003612, PIP-00003593-PIP-00003594, PIP-00000120-PIP-00000123, PIP-00000074-PIP-00000076, PIP-00000081-PIP-00000084, PIP-00004459-PIP-00004465, PIP-00000099-PIP-00000100, PIP-00001080, PIP-00001082-PIP-00001084, PIP-00001086-PIP-00001091, PIP-00001093-PIP-00001096, PIP-00003424-PIP-00003428, PIP-00001085, PIP-00003482-PIP-00003484, PIP-00003491-PIP-00003497, PIP-00000103-PIP-00000104, PIP-00003372-PIP-00003374, PIP-00003441-PIP-00003443, PIP-00003454-PIP-00003456, PIP-00003451, PIP-00003574-PIP-00003576, PIP-00000068-PIP-00000072, PIP-00000079-PIP-00000080, PIP-00000088-PIP-00000089, PIP-00000095-PIP-00000096, PIP-00000101-PIP-00000102, AMcTX-00055818-AMcTX-00055820, PIP-00000119, PIP-00000073	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
968)	Year 2015	2015 NRA 990 Form		
969)	Year 2016	2016 NRA 990 Form		
970)	Year 2017	2017 NRA 990 Form		
971)	Year 2018	Ex M to Spofford Decl - NRA Presentation America's Most Patriotic Brand	AMc 002956	
972)	Year 2018	2018 NRA 990 Form		
973)	Year 2019	2019 NRA 990 Form		
974)	Year 2020	2019 NRA 990 Form		
975)	Year 2021	NRA 990 Instructions		Relevance – FED. R. EVID. 401, 402
976)		AMc timesheets	AMc-055854-55930	Relevance – FED. R. EVID. 401, 402
977)		Hart to Makris re Meeting	AMcTX-00010697	
978)		Email from Makris to Hart re WLP late	AMcTX-00010699	
979)		Makris to Hart re WLP body language	AMcTX-00010701	
980)		Email from Makris to Hart re Josh	AMcTX-00035767	
981)		Email from Hart to Makris re Josh Designation	AMcTX-00035772	
982)		Makris to Hart re late start to meeting	AMcTX-00035773	
983)		NRATV Powerpoint Presentation - NRATV Year 1 Valuation - Overall Valuation, Valuation by Series	AMcTX-00042333 / AMcTX-00054968	

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
984)		AMc ledger information re cost of services, and other "miscellaneous direct" costs incurred on NRATV-related projects	AMcTX-00053225	Relevance – FED. R. EVID. 401, 402
985)		Letters dated 10/XX/18 (draft) - Winkler to North and Madrid to Hart re AMc's notice of termination of the Services Agreement	AMcTX-00065396-65400	
986)		Dashboard Access rights list	AMcTX-00070051	Relevance – FED. R. EVID. 401, 402
987)		AMc's T&E Expense Policy	Exhibit 1 of Brandon Winkler deposition (not produced by AMc or NRA)	Relevance – FED. R. EVID. 401, 402
988)		Vendor History Report summarizing all payments made by NRA to AMc from 2009 - 2020, i.e., \$230.5m	NRA-AMc_00185685-185689	Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
989)		NRATV - Thomas the Train KKK Video		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
990)		How to Work With Law Firms, One of PR's More Complex Clients		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
991)		Working with Your Public Relations Firm (https://prcouncil.net/wp-content/uploads/2011/04/working).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
992)		Megan Allen email exchange with Nader Tavangar – May 2016.		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802
993)		Internal Control—Integrated Framework issued by Committee of Sponsoring Organizations of the Treadway Commission (May 2013 update), available at https://www.coso.org/Pages/ic.aspx		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
994)		Excerpt of Ackerman's Volume 16 production index		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
995)		Excerpt from Neil T. Bendle et al., Marketing Metrics the Managers Guide to Measuring Marketing Performance		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
996)		NRATV Social Media Accounts (including, but not limited to Facebook, Twitter, Instagram, and YouTube as they publicly exist)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
997)		Index Vol0001-2, AMcTX-00260560		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
998)		Index Vol0001-2, AMcTX-00261298		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
999)		Distinguish Between Primary and Secondary Sources, Univesity of California, Santa Cruz webpage		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1000)		See also screencapture-qlik-sense-am-sense-app-0c94cb7d-8713-4c60-8a3c-75d20cba62ed-sheet-KpJJDcJ-stateanalysis-2021-09-27-19_24_24.		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1001)		screencapture-qlik-sense-am-sense-app-0c94cb7d-8713-4c60-8a3c-75d20cba62ed-sheet-b91193d0-14f4-4071-8002-1721f563bdb0-state-analysis-2021-09-27-18_46_23		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1002)		screencapture-qlik-sense-am-sense-app-0c94cb7d-8713-4c60-8a3c-75d20cba62ed-sheet-gvtTC-state-analysis-2021-09-27-18_44_15		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1003)		screencapture-qlik-sense-am-sense-app-23d92e56-3124-4919-a420-909bfd3aeac-sheet-gtkKaUY-state-analysis-2021-09-27-18_56_37		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1004)		screencapture-qlik-sense-am-sense-app-0c94cb7d-8713-4c60-8a3c-75d20cba62ed-2021-10-20-08_46_58.pdf		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1005)		screencapture-qlik-sense-am-sense-app-23d92e56-3124-4919-a420-909bfd3aeac-2021-10-20-08_57_26.pdf		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1006)		AWS Regions and Availability Zones		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
1007)		Definition of Forensic Image from whatis.techtarget.com		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1008)		Screenshot of Qlik Bad Security Certificate Warning		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1009)		AWS knowledge center- copying S3 objects		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1010)		AWS- Data transfer within the same AWS Region		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1011)		AWS- Pricing		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1012)		NRA Video Content Executive Dashboard (The actual live Dashboard)		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802 Lack of authenticity – FED. R. EVID. 901
1013)		Commentary: "Half my Digital Advertising is wasted..." by Marc Pritchard		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1014)		"Which half is wasted?": Controlled Experiments to measure online-advertising effectiveness by David Reiley		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1015)		Effective Frequency-Marketing Dictionary.org		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1016)		Super Bowl television ratings- Wikipedia		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1017)		History- Media Rating Council		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1018)		Accredited Services- Media Rating Council		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1019)		AMA Code of Conduct		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1020)		Ethics in Public Relations- George Washington University		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1021)		Code of Conduct- DJE Holdings		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1022)		Tableau Software- Wikipedia		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1023)		Pat Hanrahan- Wikipedia		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1024)		The Importance of a Marketing Report- Whatagraph.com		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1025)		Google third-party policy		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
1026)		Data Compression- Wikipedia		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1027)		screenshot-qlik-sense-am-sense-app-0c94cb7d-8713-4c60-8a3c-75d20cba62ed-sheet-b91193d0-14f4-4071-8002-1721f563bdb0-state-analysis-2021-09-03-01_10_35		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1028)		screenshot-qlik-sense-am-sense-app-23d92e56-3124-4919-a420-909bfd3aeac-2021-09-01-19_16_42		Relevance – FED. R. EVID. 401, 402; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1029)	06/05/18	NRA Policy Manual	NRA-AMc_00070430	Relevance – FED. R. EVID. 401, 402
1030)		AMc Text Messages (Selected communications from the document bearing the bate range AMcTX-00339383 - AMcTX-00339421)	AMcTX-00339383	
1031)	07/26/18	Internal Compliance Seminar	NRA-AMc_00170058	
1032)	04/22/19	Cover Email w/ Letter Winkler to Spray re OOP expenses	NRA-AMc_00091625	
1033)	04/22/19	Cover Email w/ ltr and attachments - Winkler to Schropp re OOP expenses	NRA-AMc_00069136	
1034)	05/17/18	OOP Invoices from 5/7/2018 Includes Concur Report	AMc-0032289	
1035)	05/01/19	5/1/2019 Talent Invoice \$680K	AMc-042136	
1036)	05/21/19	NRA-AMc - Budget/Payment Excel	NRA-AMC_00069631	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
1037)	01/11/19	Cover Email from M. Erstling to D. Reno attaching NRA-AMc - Budget/Payment Excel	NRA-AMc_00058407	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
1038)		NRA Homepage - Statement from WLP to Members re NRA TV		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1039)	02/27/19	Compliance Meeting Sign-In Sheet	NRA-BK-00058012-14	
1040)	11/07/19	Compliance Meeting Sign-In Sheet	NRA-BK-00058009-11	
1041)	11/07/19	Upper Management Seminar- Compliance and Governance Refresher	NRA-BK-00057656-7710	
1042)	07/26/18	Upper Management Seminar- Compliance and Governance Refresher	NRA-BK-00056431-81	
1043)	02/27/19	Upper Management Seminar- Compliance and Governance Refresher	NRA-BK-00057115/NYAGCOMMDIV-00200048	
1044)		Timeline of WBB/Dallas Security	NYAG-00120683	Relevance – FED. R. EVID. 401, 402
1045)	04/16/18	Cover Email and Attachments (5) from P. Padilla to S. Rowling	NRA-AMc_00138690-138729	Relevance – FED. R. EVID. 401, 402
1046)	04/30/18	Email from M. Erstling to R. Tedrick re Equipment Purchases	NRA-AMc_00038403	Relevance – FED. R. EVID. 401, 402
1047)	05/15/18	Email from D. Reno to M. Erstling re Equipment Purchases	NRA-AMc_00101560-61	Relevance – FED. R. EVID. 401, 402
1048)	07/30/18	Email and Attachment from M. Erstling to J. Powell	NRA-AMc_00188206-07	Relevance – FED. R. EVID. 401, 402 Optional Completeness – FED. R. EVID. 106 (attachment missing)
1049)	07/31/18	Email and Attachment from M. Erstling to R. Tedrick	NRA-AMc_00057122-31	Relevance – FED. R. EVID. 401, 402 Optional Completeness – FED. R. EVID. 106 (attachment missing)
1050)		AMcTX-00251627_Log File	AMcTX-00251627	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403
1051)	11/05/18	Email from B. Floyd to A. Bilinski, etal	AMcTX-00057095	Relevance – FED. R. EVID. 401, 402
1052)	12/06/18	Email from A. Bilinski to G. Spofford re: Youtube API Credentials	AMcTX-00059555	Relevance – FED. R. EVID. 401, 402
1053)	12/06/18	Email from G. Spofford to A. Bilinkso re: Youtube API Credentials	AMcTX-00059557	Relevance – FED. R. EVID. 401, 402
1054)	12/06/18	Email from A. Bilnski to G. Spofford re: Youtube API Credentials	AMcTX-00059561	Relevance – FED. R. EVID. 401, 402
1055)	02/13/19	Email chain between A. Bilkinski and C. Davis re: Qlik Reference Info	AMcTX-00064237	Relevance – FED. R. EVID. 401, 402
1056)	01/14/19	Email from C. Davis to A. Bilinski re: Qlik Reference Info with attached screenshot	AMcTX-00063865	Relevance – FED. R. EVID. 401, 402
1057)	09/14/18	Email from G. Spofford to Tom Richardson re: NRA Tracking List	AMcTx-00061972	Relevance – FED. R. EVID. 401, 402
1058)	04/17/19	Email from J. Greenberg to G. Spofford & E. VanHorn re Youtube NRATV Attaching PPT Numbers	AMcTx-00059631	Relevance – FED. R. EVID. 401, 402
1059)		AM Interview Notes	PIP-0000124 - 136	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901

NRA - Exhibit List, as of February 25, 2022				
Exhibit	Date	Description	Bates numbers	AMc Objection(s)
1060)	08/14/18	Email Chain between J. Greenberg & E. Ned Taking down the Dashboard_	AMcTX-00054662	Relevance – FED. R. EVID. 401, 402
1061)	08/14/18	Email Chain between J. Greenberg & E. Ned Taking down the Dashboard_	AMcTX-00054663	Relevance – FED. R. EVID. 401, 402
1062)		2008 - 2019 TV Broadcast Network Upfront Buys CPM		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
1063)	10/13/16	Statement of Work - Amazon	PIP-002996	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1064)	04/01/18	Qlik Access List Spreadsheet	AMcTX-00061011	Relevance – FED. R. EVID. 401, 402
1065)		Facebook 2018 Visitors Spreadsheet	AMcTX-00051084	Relevance – FED. R. EVID. 401, 402
1066)	08/31/17	Project Time Detail PIP 8/12/2017 - 8/18/2017	PIP-00001095	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1067)	06/23/16	Qlik Nprinting Data Sheet	PIP-00003125	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1068)	05/02/17	Ackerman McQueen Findings & Recommendations	AMcTX-00294545	Relevance – FED. R. EVID. 401, 402
1069)	01/12/17	Email from J. Greenberg to H. Farrell & Others re: PIP Dhasboard for NRA TV	AMcTX-00276131	Relevance – FED. R. EVID. 401, 402
1070)	08/29/17	Email from E. Wang to K. Gosdin re: NRATV Video Performance Dashboard - Maintenance & Testing	AMcTX-00336749	Relevance – FED. R. EVID. 401, 402
1071)	08/07/17	Email from A. Bilinski to E. Wang re: FB Pages Likes for Reach Analysis	AMcTX-00336194	Relevance – FED. R. EVID. 401, 402
1072)	08/30/16	PIP-AMc agreement re Business Intelligence Assessment, dated 08/15/16 (fully executed on 08/30/16)	PIP-00000053	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
1073)	01/22/18	PIP Invoice No. 012218-806	PIP-00000071	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
1074)	10/05/16	Ackerman McQueen RoadMap Final 2	PIP-00003975	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
1075)	02/13/17	PIP/AM: NRATV Digital Advertising Dashboard - Phase II Scope & Outcomes	PIP-00004310	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
1076)	04/11/19	O. North Memo re NRATV	NRA-AMc_00059426	
1077)	07/15/21	All documents identified by bates number in Exhibit C to Expert Report of L. Kanter.		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901; Failure to comply with Court orders and local rules regarding trial exhibits
1078)	05/03/19	Email from Axis Corporate Security, Inc. to AMc re securty fee invoice	AMcTX-00046389	
1079)	12/31/20	Spreadsheet of COBRA Premium Reconciliation	AMcTX-00046372	
1080)	01/06/20	Spreadsheet with Details of separation and severance costs	AMcTX-00046381	
1081)	05/02/17	Email re a note of thanks for the live viewership on NRATV from traditional two service providers namely US Dept of Justice and US Senate	AMcTX-00294537-43	Relevance – FED. R. EVID. 401, 402
1082)	10/12/16	Email chain Re: Cambridge NRA TV	AMcTX-00053624	Relevance – FED. R. EVID. 401, 402
1083)		[CA-AM_DMPDataCollection_Proposal-061316] Cambridge Analytica - Ackerman McQueen - Gaining Audience Insight and Activation through Data and Psychology	PIP-00003892-97	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1084)	09/23/16	Email string discussing Schedule for Final Recommendation; enclosing (1) CA-AM_DMPDataCollection_Proposal-061316.pdf, (2) Re_DMP tag.msg, (3) audienceinsight.jpg, (4) demo.jpg, (5) device.jpg, (6) financial.jpg, (7) geo.jpg	PIP-00003889-91	Relevance – FED. R. EVID. 401, 402
1085)	01/23/17	[ACR-NRA Dashboard-StatusReport1.20.17] Weekly Status Report - Client: Ackerman McQueen - Week Ending: 1/20/2017 - Project: NRA Dashboard	PIP-00003646	Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802
1086)		Spreadsheet with Employee Census	AMcTX-00046382	Relevance – FED. R. EVID. 401, 402

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Exhibit	Date	Description	Bates numbers	AMc Objection(s)
1087)	08/02/04	Richard Williamson, The Ride's Far From Over At Ackerman McQueen, ADWEEK (Aug. 2, 2004) https://www.adweek.com/brand-marketing/rides-far-over-ackerman-mcqueen-74043/ .		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1088)	08/24/98	Glen Fest, Ackerman McQueen Collects 4 For \$5 Mil., ADWEEK (Aug. 24, 1988) https://www.adweek.com/brand-marketing/ackerman-mcqueen-collects-4-5-mil-36500/ .		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1089)	10/02/98	CSBJ Web Admin, CSCVB hires Ackerman McQueen, COLORADO SPRINGS BUSINESS JOURNAL (Oct. 2, 1998) https://www.csbj.com/cscvb-hires-ackerman-mcqueen/article_c727d3b2-55f4-5dee-ae45-e43777ab9d36.html .		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1090)	02/28/14	Candace Carlisle, Ackerman McQueen's Dallas office designed to reinforce client relationships, Dallas Business Journal (Feb. 28, 2014) https://www.bizjournals.com/dallas/news/2014/02/28/ackerman-mcqueens-dallas-office-designed-to.html .		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1091)	02/12/14	Press Release, Staffelbach, Ackerman McQueen's New Uptown Office Offers VIP Client Experience (Feb. 12, 2014).		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1092)	08/23/13	Taylor Tompkins, Largest North Texas Advertising Agencies, DALLAS BUSINESS JOURNAL (Aug. 23, 2013) https://www.bizjournals.com/dallas/subscriber-only/2013/08/23/largest-north-texas-advertising-agencies.html .		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901
1093)	09/11/18	Maria Perez, NRA TV Airs Photo of Thomas the Tank Engine In KKK Hood In 'Ethnic Diversity' Segment, NEWSWEEK (Sep. 11, 2018) https://www.newsweek.com/nra-tv-thomas-tank-engine-kk-hood-ethnic-diversity-segment-1115652 .		Relevance – FED. R. EVID. 401, 402; FED. R. EVID. 403; Hearsay – FED. R. EVID. 801, 802; Lack of authenticity – FED. R. EVID. 901

The NRA may, at its sole election, request that the Court take judicial notice of, or otherwise offer any of, the below listed documents into evidence at the time of the trial. The NRA further reserves the right to offer any documents, which may be designated or offered by any Defendant. The NRA reserves the right to offer or use any exhibits (whether designated below or by the NRA) as may be necessary for cross-examination, impeachment, or rebuttal.

Dated: February 25, 2022

Respectfully submitted,

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Statement Pursuant to Paragraph 8 of the Scheduling Order

As to each of the exhibits on the NRA's Trial Exhibit List:

- (a) AMc agrees to the admissibility of the exhibit (reserving the right to register objections pursuant to FRE 402 or 403), or
- (b) AMc objects to the admissibility of the exhibit, as indicated in the column marked "AMc Objections(s)" on the exhibit list.

February 25, 2022.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2022, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel of record by a manner authorized by the Federal Rules of Civil Procedure.

/s/ Philip J. Furia
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